

1 Kim Schumann, Esq., State Bar #170942  
2 Jeffrey P. Cunningham, Esq., State Bar #151067  
3 Peter Cook, Esq., State Bar #232742  
4 **SCHUMANN, RALLO & ROSENBERG, LLP**  
5 3100 Bristol Street, Suite 400  
Costa Mesa, CA 92626  
Telephone (714) 850-0210  
Facsimile (714) 850-0551  
Email: [pcook@srrlawfirm.com](mailto:pcook@srrlawfirm.com)

6 | Attorneys for Defendant, ORLY TAITZ

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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

11 LISA LIBERI, *et al.*  
12 Plaintiffs,  
13 vs.  
14 ORLY TAITZ, *et al.*  
15 Defendants.

Case No. 8:11-CV-00485-AG (AJW)  
Hon. Andrew Guilford  
Courtroom 10D

**EVIDENTIARY OBJECTIONS BY  
DEFENDANT, ORLY TAITZ, TO  
DECLARATIONS FILED BY  
PLAINTIFFS WITH THEIR  
OPPOSITION TO DEFENDANT'S  
MOTION TO DISMISS PURSUANT  
TO FRCP 12(b)(6)**

Date: August 22, 2011  
Time: 10:00 a.m.  
Place: Courtroom 10D

Date Action Filed: May 4, 2009  
Discovery Cut-Off: March 5, 2012  
Final Pre-Trial Conf.: May 21, 2012  
Trial Date: June 5, 2012

23 TO THE COURT, ALL PARTIES, AND/OR THEIR ATTORNEYS OF  
24 RECORD:

25       **COMES NOW**, Defendant, ORLY TAITZ (“Moving Defendant”), who  
26 submits the following evidentiary objections to, and moves to strike, the  
27 Declarations of Plaintiffs, LISA LIBERI and LISA OSTELLA, as well as the  
28 Declaration of Charles Edward Lincoln, III, and all other extrinsic evidence,

1 submitted with Plaintiffs' Opposition to Moving Defendant's Motion to Dismiss  
2 pursuant to FRCP 12(b)(6). This Memorandum is submitted in reply to Plaintiffs'  
3 opposition to Moving Defendant's subject Motion.

4 **I. GENERAL OBJECTIONS TO CONSIDERATION OF PLAINTIFFS'**  
5 **AND CHARLES EDWARD LINCOLN III'S DECLARATIONS AND**  
6 **RELATED EXHIBITS REGARDING MOVING DEFENDANTS' FRCP**  
7 **RULE 12(b)(6) MOTION TO DISMISS**

8 Moving Defendant has filed an FRCP Rule 12(b)(6) Motion to dismiss  
9 Plaintiffs' First Amended Complaint ("FAC"). She has not filed a Motion for  
10 summary judgment. Moving Defendant's Motion to dismiss challenges the legal  
11 sufficiency of the FAC, based on its allegations shown on the "face" of the  
12 pleading. She does not rely on, nor submit evidence of, any matter extrinsic to the  
13 FAC.

14 Plaintiffs - tacitly conceding the insufficiency of the FAC's allegations - in  
15 opposition to such Motion submit three lengthy declarations from Plaintiffs LIBERI  
16 and OSTELLA and non-party, Mr. Lincoln (a former attorney disbarred in Texas  
17 and California), as well as voluminous exhibits consisting of approximately 270  
18 pages.

19 Instead of arguing the legal sufficiency of the FAC in their opposition,  
20 Plaintiffs in such declarations apparently hope to prove some vague and confusing  
21 claim having little or no relation to what is actually pled in the FAC. There is a  
22 complete "disconnect" between what is pled in the FAC and the unintelligible  
23 contentions raised in such declarations; Plaintiffs fail to link any contention raised  
24 in such declarations to any claim for relief pled in the FAC.

25 Moreover, as a matter of law, Plaintiffs' and Mr. Lincoln's declarations and  
26 their related exhibits cannot be considered on Moving Defendants' FRCP Rule  
27 12(b)(6) Motion to dismiss the FAC. Such Motion is limited to the "face" of the  
28 FAC and matters judicially noticed. FRCP Rule 12(b)(6). Bell Atlantic Corp. v.

1 Twombly, 550 U.S. 544, 563 (2007). Szoke v. Carter, 165 F.R.D. 34, 36 (S.D.N.Y.  
2 1996). Graehling v. Village of Lombard, 58 F.3d 295, 298 (7th Cir. 1995). Monroe  
3 v Cessna Aircraft Co., 417 F.Supp.2d 824, 827.

4 Moving Defendant therefore objects to Plaintiffs' and Mr. Lincoln's  
5 declarations and their related exhibits being considered in opposition to her Motion  
6 to dismiss. Moving Defendant moves to strike such improper extrinsic evidence.

7 **II. SPECIFIC OBJECTIONS TO PLAINTIFFS' AND CHARLES**  
8 **EDWARD LINCOLN III'S DECLARATIONS AND RELATED**  
9 **EXHIBITS**

10 As stated, Plaintiffs' and Mr. Lincoln's declarations and their related exhibits  
11 cannot be considered herein. However, *if* the Court does consider such matters,  
12 Moving Defendant submits the following specific evidentiary objections to them.  
13 Such objections are submitted with an express reservation of Moving Defendant's  
14 general objections to Plaintiffs' and Mr. Lincoln's declarations and their related  
15 exhibits being considered, and without waiving such general objections. As shown  
16 below, such declarations are devoid of any competent or admissible evidence.

17 ***A. Objections to Declaration of Plaintiff, Lisa Liberi***

18 **EVIDENTIARY OBJECTIONS**

19 <b>DECLARATION OF</b> 20 <b>PLAINTIFF, LISA LIBERI</b>	21 <b>MOVING</b> <b>DEFENDANT'S</b> <b>OBJECTIONS</b>	22 <b>COURT'S</b> <b>RULING</b>
23 1.“I filed suit against Ms. Taitz 24 and the other Defendants as a 25 result of the illegal background 26 check conducted on me; the 27 illegal access of my credit reports; the illegal disclosure of	28 Irrelevant. Fed. R. Evid. (“FRE”), Rules 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602.	Sustained: _____ Overruled: _____

1	my full Social Security number, date of birth, place of birth, mother's maiden name, father's name, home address, telephone number, the harassment of my friends and family, and Ms. Taitz's disclosure of my private details to John Mark Allen, my son's father who my son and I were provided protection from as a result of the crimes committed against us. Ms. Taitz continues twisting the reasons Plaintiffs filed suit and continues misstating the truth. All of which Orly Taitz has admitted in her Motion to Dismiss filed on behalf of Defend our Freedoms Foundations, Inc., Docket No. 283." Declaration of Lisa Liberi, ¶ 1.	Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged "illegal" acts. Argumentative.	
22	2. "Orly Taitz has threatened me several times. Orly Taitz stated she was going to destroy me and get rid of me, which Orly Taitz has admitted in her Court filings. Orly Taitz has put out on the	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level	Sustained: _____ Overruled: _____

1	Internet on her website that I	hearsay. FRE 802 et seq.	
2	needed to be “gotten” rid of; and	Vague and ambiguous.	
3	other threats. Not only has Orly	Inadmissible opinion	
4	Taitz made these direct threats,	testimony. FRE 701 et seq.	
5	she has also implied her	Assumes facts not in	
6	intentions and threats with all her	evidence, and no	
7	postings, her statements, her	foundation, regarding	
8	circulation of my pictures and	alleged “threats.”	
9	home address, sending my	Argumentative.	
10	private details along with my		
11	pictures to white supremacy		
12	groups, hate groups, armed		
13	militia groups, posting about me		
14	on average every two (2) to three		
15	(3) days for the past 2-1/2 years,		
16	calling for her supporters in		
17	Santa Fe, New Mexico where I		
18	reside to assist her regarding me,		
19	etc.” Declaration of Lisa Liberi, ¶		
20	2.		
21	3. Orly Taitz has been asked to	Irrelevant. FRE 401, 402.	Sustained: _____
22	stop, Orly Taitz has been served	Speculation. Lacks	Overruled: _____
23	with all pleadings in this case,	foundation. No showing of	
24	she has all transcripts of all	personal knowledge of	
25	hearings, Orly Taitz is well	declarant. FRE 602.	
26	aware her actions have put me in	Hearsay. FRE 802 et seq.	
27	fear of my life and fear for the	Vague and ambiguous.	
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1	lives of my son and husband, 2 regardless, Orly Taitz has 3 continued her actions.” 4 Declaration of Lisa Liberi, ¶ 3. 5 6	Inadmissible opinion 7 testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged acts. Argumentative.	
8	4. “Orly Taitz is aware I have 9 heart complications, she 10 understands what this means as 11 she has repeatedly stated she is a 12 doctor, a dentist and a lawyer. 13 Orly Taitz is also aware of the 14 complications her harassment has 15 caused me, the hospitalizations, etc. Regardless of this, Orly 17 Taitz has continued her 18 behaviors.” Declaration of Lisa 19 Liberi, ¶ 4.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “harassment.” Argumentative.	Sustained: _____ Overruled: _____
23	5. “I watch Orly Taitz website at 24 <a href="http://www.orlytaitzesq.com">www.orlytaitzesq.com</a> as do 25 witnesses of ours for Orly Taitz’s 26 postings. All of Orly Taitz’s 27 postings on file with this Court I have obtained, as well as other	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq.	Sustained: _____ Overruled: _____

1	individuals, directly from Orly Taitz's website by going to <a href="http://www.orlytaitzesq.com">http://www.orlytaitzesq.com</a> , I then print them to PDF format and maintain a hard copy.”	Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	
2	6. “Orly Taitz was sending out her libel statements with my confidential private identifying information, including my family picture and a picture of me which Orly Taitz claims is a “mug shot”, from her dental office as a Dentist, Doctor and Attorney to give her statements credibility. In fact, Orly Taitz gave her dental office phone number at the bottom of her emails with this information as can be seen in the exhibits filed May 20, 2011, particularly Exhibit #14, see also EXHIBIT “1” attached hereto. As can be seen by Exhibit “1” attached, Orly Taitz sent Dossier #6 out via email from her yahoo email address, the email is signed “Orly Taitz, DDS, Esq” and	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “libel statements” and other alleged acts. Argumentative. Lack of authentication and identification of exhibit. FRE 901 et seq.	Sustained: _____ Overruled: _____

1	provides her dental office phone number of (949) 586-8110.”		
2	Declaration of Lisa Liberi, ¶ 6.		
3	7. Ms Taitz continues stating I 4 am a career document forger and 5 that I have a criminal record 6 going back to the 1990's. This is 7 not true, I do not have criminal 8 record going back to the 1990's 9 and I have not been convicted of 10 forgery of documents or 11 document forgery.” Declaration 12 of Lisa Liberi, ¶ 7.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged statements and other alleged acts. Argumentative.	Sustained: _____ Overruled: _____
13	8. ‘Ms. Taitz knows where I 14 reside as she put my home 15 address out all over the Internet 16 and filed it with this Court on 17 July 29, 2010. In fact, a 18 dangerous criminal, Ruben 19 Nieto, who attempted to get paid 20 by Ms. Taitz, lives in	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion	Sustained: _____ Overruled: _____

1	Albuquerque, New Mexico, forty-five minutes away from my house.” Declaration of Lisa Liberi, ¶ 8.	testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding Mr. Nieto. Argumentative.	
6	9. “Ms. Ostella was set-up as Ms. Taitz’s customer contact in Ms. Taitz’s PayPal account. This did not give Ms. Ostella access to Ms. Taitz accounts, but instead it carbon copied Ms. Ostella’s email address for PayPal payment requests from Ms. Taitz’s PayPal account.” Declaration of Lisa Liberi, ¶ 9.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: _____ Overruled: _____
16	10. “Further, Ms. Taitz has harassed every governmental agency in New Mexico to the point they called in the NM Attorney General to put a stop to Ms. Taitz harassing and illegal behaviors.” Declaration of Lisa Liberi, ¶ 10.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding	Sustained: _____ Overruled: _____
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1		alleged "harassing and illegal behaviors." Argumentative.	
2	11. "Moreover, Ms. Taitz called on her readers, followers and supporters to contact the law enforcement agency where I reside, she continued calling on them to further cyber-stalk; cyber-harass; and cyber-bully me, which they did." Declaration of Lisa Liberi, ¶ 11.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged harassment. Argumentative.	Sustained: _____ Overruled: _____
3	12. "I have received nonstop phone calls stating I am going to meet my maker real soon if I don't drop this lawsuit against Ms. Taitz. I have had strange individuals show up at my home, peeking in my windows, scrambling my phones, all after Ms. Taitz publication of my home address and telephone	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq.	Sustained: _____ Overruled: _____
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1	number.” Declaration of Lisa	Assumes facts not in	
2	Liberi, ¶ 12.	evidence, and no	
3		foundation, regarding	
4		alleged “publication.”	
5		Argumentative.	
6	13. “My local law enforcement	Irrelevant. FRE 401, 402.	Sustained: _____
7	has been forced to take reports	Speculation. Lacks	Overruled: _____
8	for stalking, Cyber-stalking,	foundation. No showing of	
9	Cyber-harassment, Cyber-	personal knowledge of	
10	bullying; fraud; forgery; identity	declarant. FRE 602.	
11	theft; threats, where they have	Hearsay, and multiple level	
12	listed the prime suspect as Orly	hearsay. FRE 802 et seq.	
13	Taitz. This is a result of all of	Vague and ambiguous.	
14	Orly Taitz publishing and	Inadmissible opinion	
15	continued republishing of her	testimony. FRE 701 et seq.	
16	threats against me, her calling for	Assumes facts not in	
17	her supporters for help regarding	evidence, and no	
18	me; and her continued	foundation, regarding	
19	publicising of my full Social	alleged “harassing and	
20	Security number, my maiden	illegal behaviors.” Lack of	
21	name, my mother’s maiden name,	identification of “reports”	
22	my father’s name, my home	referred to. FRE 901 et seq.	
23	address, my place of birth, my	Argumentative.	
24	date of birth and my husband’s		
25	primary identification		
26	information. As a result, my		
27	husband and my identities have		
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1	been stolen, our credit has been		
2	used repeatedly, accounts have		
3	been set-up fraudulently in our		
4	names using our identifying		
5	information, my credit report		
6	show shows me residing in		
7	States I have never resided		
8	including but not limited to		
9	Massachusetts and Iowa. All the		
10	law enforcement reports were		
11	forwarded to the Federal Bureau		
12	of Investigations as the crimes		
13	crossed several state lines.”		
14	Declaration of Lisa Liberi, ¶ 13.		
15	14. “As a result of Ms. Taitz’s	Irrelevant. FRE 401, 402.	Sustained: _____
16	continued harassment, cyber-	Speculation. Lacks	Overruled: _____
17	stalking, cyber-bullying, cyber-	foundation. No showing of	
18	harassment, and other illegal	personal knowledge of	
19	acts, I have had to have	declarant. FRE 602.	
20	emergency service from the	Hearsay. FRE 802 et seq.	
21	paramedics numerous times,	Vague and ambiguous.	
22	emergency room visits, cardiac	Inadmissible opinion	
23	treatments, and hospitalizations	testimony. FRE 701 et seq.	
24	due to the complications I	Assumes facts not in	
25	suffered with my heart and other	evidence, and no	
26	medical conditions, resulting	foundation, regarding	
27	from stress induced by Orly Taitz	alleged “harassment” and	
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1	and the other Defendants. This	“illegal acts.” Lack of	
2	has cost my family in excess of	identification of “medical	
3	\$250,000.00. My medical bills	bills” referred to. FRE 901	
4	to date were provided to Judge	et seq. Argumentative.	
5	Robreno on December 20, 2010.”		
6	Declaration of Lisa Liberi, ¶ 14.		
7	15. “Ms. Taitz is well aware of	Irrelevant. FRE 401, 402.	Sustained: _____
8	what she is doing; she has talked	Speculation. Lacks	Overruled: _____
9	about my medical complications	foundation. No showing of	
10	on her radio shows, TV	personal knowledge of	
11	appearances and in her pleadings	declarant. FRE 602.	
12	filed with this Court.”	Hearsay, and multiple level	
13	Declaration of Lisa Liberi, ¶ 15.	hearsay. FRE 802 et seq.	
14		Vague and ambiguous.	
15		Inadmissible opinion	
16		testimony. FRE 701 et seq.	
17		Assumes facts not in	
18		evidence, and no	
19		foundation, regarding	
20		alleged acts. Lack of	
21		identification of	
22		“pleadings” referred to.	
23		FRE 901 et seq.	
24		Argumentative.	
25	16. “Ms. Taitz is well aware of	Irrelevant. FRE 401, 402.	Sustained: _____
26	the fact I do not and did not at	Speculation. Lacks	Overruled: _____
27	the time suit was original filed in	foundation. No showing of	
28	Pennsylvania, May 4, 2009,	personal knowledge of	

1	reside in the State of California.	declarant. FRE 602.	
2	Ms. Taitz has stalked my son, has	Hearsay, and multiple level	
3	published trips my son has taken,	hearsay. FRE 802 et seq.	
4	private details about my son. My	Vague and ambiguous.	
5	son attends school in New	Inadmissible opinion	
6	Mexico where we reside and Ms.	testimony. FRE 701 et seq.	
7	Taitz admitted to this in her	Assumes facts not in	
8	statements in her radio	evidence, and no	
9	appearance on the Andrea She-	foundation, regarding	
10	King Radio show which can be	alleged stalking and	
11	found on the Internet at	publication. Lack of	
12	<a href="http://www.blogtalkradio.co/asks">http://www.blogtalkradio.co/asks</a>	identification of	
13	how/2010/08/31/the-andrea-	photographs referred to.	
14	shea-king-show.mp3. In this	FRE 901et seq.	
15	Radio program, Ms. Taitz states:	Argumentative.	
16	“...Against Neil Sankey, a top		
17	notch private investigator who		
18	was the first one to find all of		
19	this information on Social		
20	Security numbers...I’m sorry but		
21	this woman Lisa Liberi is		
22	supposed to be back in prison...		
23	And I have provided direction, I		
24	have provided the pictures.		
25	Here’s her picture that came from		
26	her boyfriend: ‘That’s Lisa		
27	Liberi, I have a child with her.””		
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1	[Emphasis added].” Declaration 2 of Lisa Liberi,¶ 16.		
3	17. “As I am sure this Court is 4 aware, directions can be to a 5 location or it can be to do 6 something.” Declaration of Lisa 7 Liberi,¶ 17.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602.  Hearsay, and multiple level hearsay. FRE 802 et seq.  Vague and ambiguous.  Inadmissible opinion testimony. FRE 701 et seq.	Sustained: _____  Overruled: _____
13	18. Ms. Taitz continues in this 14 radio program falsely accusing 15 me of being a career document 16 forger; and then states I accused 17 her of trying to hire a ‘hitman’ to 18 kidnap my son, and the Taitz 19 asks her audience, did something 20 happen to Liberi’s son? I have 21 never claimed Taitz attempted to 22 hire a ‘hitman’ or that Ms. Taitz 23 was going to have my son 24 kidnapped. Ms. Taitz is the one 25 who continually uses ‘hitman’. I 26 have stated that it appears Ms. 27 Taitz has attempted to hire a 28 dangerous criminal to harm Lisa	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602.  Hearsay, and multiple level hearsay. FRE 802 et seq.  Vague and ambiguous.  Inadmissible opinion testimony. FRE 701 et seq.  Assumes facts not in evidence, and no foundation, regarding alleged hiring of “dangerous criminal.”  Argumentative.	Sustained: _____  Overruled: _____

1	Ostella, me and our family's."		
2	Declaration of Lisa Liberi, ¶ 18.		
3	19. "Ms. Taitz threatened to	Irrelevant. FRE 401, 402.	Sustained: _____
4	have Ms. Ostella's children	Speculation. Lacks	Overruled: _____
5	professionally kidnapped. A	foundation. No showing of	
6	man in Albuquerque, NM	personal knowledge of	
7	attempted to get paid by Ms.	declarant. FRE 602.	
8	Taitz in three consecutive money	Hearsay, and multiple level	
9	requests totaling \$25,000.00.	hearsay. FRE 802 et seq.	
10	The requests came in	Vague and ambiguous.	
11	consecutively in the amount of	Inadmissible opinion	
12	\$9,000.00 and two (2) in the	testimony. FRE 701 et seq.	
13	amount of \$8,000.00 totaling	Assumes facts not in	
14	\$25,000.00, as on file with this	evidence, and no	
15	Court. Mr. Nieto requested	foundation, regarding	
16	payment twice, on May 25, 2009	alleged threats and other	
17	and May 29, 2009, in the middle	acts. Lack of identification	
18	of the night. It was bothering to	of "requests" referred to.	
19	see the requests were under the	FRE 901 et seq.	
20	\$10,000.00 reporting amounts	Argumentative.	
21	pursuant to the Patriot Act."		
22	Declaration of Lisa Liberi, ¶ 19.		
23	20. "A spokeo was run on this	Irrelevant. FRE 401, 402.	Sustained: _____
24	man, Ruben Nieto and his email	Speculation. Lacks	Overruled: _____
25	address. Spokeo returned that	foundation. No showing of	
26	Mr. Nieto resided in	personal knowledge of	
27	Albuquerque, NM and provided	declarant. FRE 602.	
28	his birth date. A simple search of	Hearsay, and multiple level	

1	the NM Judiciary System returned	hearsay. FRE 802 et seq.	
2	Mr. Nieto's convictions for	Vague and ambiguous.	
3	Aggravated Assault. Further	Inadmissible opinion	
4	searches confirmed Mr. Nieto	testimony. FRE 701 et seq.	
5	was not an Attorney, or a Private	Assumes facts not in	
6	Investigator, or a trade which a	evidence, and no	
7	licensed attorney would hire for	foundation, regarding	
8	permissible purposes. Instead,	alleged threats and other	
9	Mr. Nieto has websites selling	acts. Lack of identification	
10	porno and marijuana seeds."	of "searches" referred to.	
11	Declaration of Lisa Liberi, ¶ 20.	FRE 901et seq.	
12		Argumentative.	
13	21. "So yes, I do believe Ms.	Irrelevant. FRE 401, 402.	Sustained: _____
14	Taitz attempted to hire this an to	Speculation. Lacks	Overruled: _____
15	carry out her threats towards me	foundation. No showing of	
16	and Mrs. Ostella, to harm me and	personal knowledge of	
17	my family and harm Mrs. Ostella	declarant. FRE 602.	
18	and her family. Ms. Taitz never	Hearsay, and multiple level	
19	disputed that Mr. Nieto's PayPal	hearsay. FRE 802 et seq.	
20	money requests were not from	Vague and ambiguous.	
21	her PayPal account. I asked Ms.	Inadmissible opinion	
22	Taitz on December 20, 2010 in	testimony. FRE 701 et seq.	
23	Judge Robreno's courtroom if	Assumes facts not in	
24	she was saying the PayPal	evidence, and no	
25	account the money requests from	foundation, regarding	
26	Mr. Nieto was not her PayPal	alleged threats and other	
27	account, and Ms. Taitz answered	acts. Argumentative.	
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1	“NO”, because they were. See		
2	the December 20, 2010		
3	Transcript, page 94, lines 7-11,		
4	filed on the docket January 14,		
5	2011, appearing as docket entry		
6	162.” Declaration of Lisa		
7	Liberi, ¶ 21.		
8	22. “Further, anything I confirm	Irrelevant. FRE 401, 402.	Sustained: _____
9	regarding my address	Speculation. Lacks	Overruled: _____
10	information with this Court will	foundation. No showing of	
11	be placed all over the Internet by	personal knowledge of	
12	Ms. Taitz. For this reason, I will	declarant. FRE 602.	
13	not provide a copy of my driver’s	Hearsay. FRE 802 et seq.	
14	license to Ms. Taitz or even show	Vague and ambiguous.	
15	it to her for that matter.”	Inadmissible opinion	
16	Declaration of Lisa Liberi, ¶ 22.	testimony. FRE 701 et seq.	
17		Assumes facts not in	
18		evidence, and no	
19		foundation, regarding	
20		alleged publication.	
21		Argumentative.	
22	23. “Ms. Taitz filed false police	Irrelevant. FRE 401, 402.	Sustained: _____
23	reports with Orange County and	Speculation. Lacks	Overruled: _____
24	had them transferred to Santa Fe	foundation. No showing of	
25	Police Department claiming Lisa	personal knowledge of	
26	Ostella and I were the same	declarant. FRE 602.	
27	person and that I stole monies	Hearsay, and multiple level	
28	from her (Taitz), see EXHIBIT	hearsay. FRE 802 et seq.	

1	“2.” Ms. Taitz was well aware this information was false. In fact, one of the attachments given to the Police Department by Ms. Taitz was her Dossier #6 which contains a PayPal receipt Ms. Taitz claims was stolen, see EXHIBIT “3.” Ms. Taitz statements regarding the missing money was patently false as were her other accusations. Attached hereto as EXHIBIT “4” is Ms. Taitz PayPal Record for her account ending in 4372 obtained by subpoena. The donation referenced in Dossier #6 is showing as received in Ms. Taitz PayPal records, see page .” Declaration of Lisa Liberi, ¶ 23.	Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “reports” and other acts. Lack of identification of “reports” referred to. FRE 901et seq. Lack of authentication and identification of exhibits. FRE 901et seq. Argumentative.	
20	24. It is obvious and Orly Taitz was well aware that Lisa Ostella and I are not the same person. I reside in New Mexico and Lisa Ostella resides in New Jersey. Lisa Ostella worked for Ms. Taitz for a short period of time, and Ms. Ostella and Ms. Taitz	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous.	Sustained: _____ Overruled: _____

1	mailed things back and forth to 2 each other. Further, Lisa Ostella 3 and Mrs. Taitz had telephone 4 conversations which required 5 Ms. Taitz to call Lisa Ostella's 6 phone number which is located 7 in New Jersey. In fact, Orly 8 Taitz put out Lisa Ostella's home 9 address and telephone number 10 summonsing all her supporters to 11 report Lisa Ostella to the North 12 Brunswick, New Jersey Police 13 Department at the same time Orly 14 Taitz was summonsing her 15 supporters to bombard the Sante 16 Fe Probation Department and 17 Sante Fe Police Department 18 regarding me." Declaration of 19 Lisa Liberi, ¶ 24.	Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged "summoning" and other acts. Argumentative.	
20	25. "Orly Taitz filed numerous 21 false reports with the Sante Fe 22 Probation Department, all of 23 which were investigated and 24 found to be without merit. When 25 this failed and law enforcement 26 failed, Orly Taitz filed an 27 Emergency Petition in the San	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous.	Sustained: _____ Overruled: _____

1	Bernardino County Superior	Inadmissible opinion	
2	Court to have my probation	testimony. FRE 701 et seq.	
3	revoked. Orly Taitz filed these	Assumes facts not in	
4	same false accusations that were	evidence, and no	
5	filed with the Orange County	foundation, regarding	
6	Sheriff's Department; Santa Fe	alleged "reports" and other	
7	Police Department; the Santa Fe	acts. Lack of identification	
8	Probation Department; the San	of reports and petition	
9	Bernardino County District	referred to. FRE 901et seq.	
10	Attorney's Office and the San	Argumentative.	
11	Bernardino County Probation		
12	office. Except, Orly Taitz		
13	included that I tampered with her		
14	car, jeopardizing her and her		
15	families lives and killed my		
16	sister." Declaration of Lisa		
17	Liberi, ¶ 25.		
18	26. "This Case had been closed	Irrelevant. FRE 401, 402.	Sustained: _____
19	for three (3) years and was	Speculation. Lacks	Overruled: _____
20	reopened due to Orly Taitz's	foundation. No showing of	
21	petition. Three (3) court	personal knowledge of	
22	hearings took place, and on each	declarant. FRE 602.	
23	hearing Orly Taitz was	Hearsay, and multiple level	
24	publishing it on her website, as	hearsay. FRE 802 et seq.	
25	filed on May 20, 2011 with this	Vague and ambiguous.	
26	Court, see docket no 190 through	Inadmissible opinion	
27	190-27, and summonsing people	testimony. FRE 701 et seq.	
28			

1	to attend the hearings and be	Assumes facts not in	
2	“victims” of “Liberi’s”. I had to	evidence, and no	
3	have counsel attend the hearings.	foundation, regarding	
4	The Court found absolutely no	alleged “summoning” and	
5	merit to Orly Taitz, Neil Sankey	other acts. Argumentative.	
6	and Orly Taitz’s supporters false		
7	reports, I was found “not guilty”		
8	of any violations and the case		
9	closed again. All of this was		
10	done with malicious intent. Orly		
11	Taitz was attempting every way		
12	possible to have me falsely		
13	accused and jailed because I was		
14	and am suing her, which was her		
15	ulterior motive.” Declaration of		
16	Lisa Liberi, ¶ 26.		
17	27. “Orly Taitz was very	Irrelevant. FRE 401, 402.	Sustained: _____
18	unhappy so she began seeking	Speculation. Lacks	Overruled: _____
19	her supporters to file formal	foundation. No showing of	
20	complaints against the	personal knowledge of	
21	supervising Probation Officers in	declarant. FRE 602.	
22	San Bernardino County. Orly	Hearsay, and multiple level	
23	Taitz at this same time also put	hearsay. FRE 802 et seq.	
24	all over the Internet that I had	Vague and ambiguous.	
25	four (4) active felony charges,	Inadmissible opinion	
26	knowing this information was	testimony. FRE 701 et seq.	
27	false. See Exhibits “125”	Assumes facts not in	
28			

1	through "128" filed May 20, 2011, which I located on Orly 3 Taitz website by going to 4 <a href="http://www.orlytaitzesq.com">http://www.orlytaitzesq.com</a> . 5 Again, all of which shows Orly 6 Taitz's malicious intent. 7 Declaration of Lisa Liberi, ¶ 27. 8	evidence, and no foundation, regarding alleged "seeking her supporters" and other acts. Lack of authentication and identification of exhibits. FRE 901et seq. Argumentative.	
9	28. "I have never worked for or 10 had anything to do with Orly 11 Taitz. I am not a blogger; I do 12 not and have not posted anything 13 on the Internet, on web forums, 14 on bulletin boards, nowhere on 15 the World Wide Web about Orly 16 Taitz, her company, her family, 17 or anyone she knows. I have 18 never authorized Orly Taitz or 19 any of the other Defendants to 20 publish my private data, obtain 21 and publish my family pictures or 22 single photos, none of which are 23 public, publish my home address 24 or any other information about 25 me. I am not a public person." 26 Declaration of Lisa Liberi, ¶ 28.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged publication and other acts. Argumentative.	Sustained: _____ Overruled: _____
27	29. "Since the filing of all the 28 Exhibits on May 20, 2011,	Irrelevant. FRE 401, 402. Speculation. Lacks	Sustained: _____ Overruled: _____

1	29. "Since the filing of all the	foundation. No showing of	
2	Exhibits on May 20, 2011,	personal knowledge of	
3	docket number 190 through 190-	declarant. FRE 602.	
4	27, Orly Taitz continued her	Hearsay, and multiple level	
5	postings of false information and	hearsay. FRE 802 et seq.	
6	had the postings posted on	Vague and ambiguous.	
7	websites which Orly Taitz has	Inadmissible opinion	
8	log-ins and posting privileges	testimony. FRE 701 et seq.	
9	with. In fact,	Assumes facts not in	
10	www.skypeassholes.com's	evidence, and no	
11	postings regarding me were from	foundation, regarding	
12	"Bob Stevens" Orly Taitz's web	alleged "postings" and	
13	person. These other websites	other acts. Lack of	
14	"www.skypeassholes.com" and	identification of "postings"	
15	"http://domesticenemies.net"	referred to. FRE 901et seq.	
16	swastika's; Mossad; Aryan	Lack of authentication and	
17	brotherhood; and other armed	identification of exhibits.	
18	militia type symbols and have a	FRE 901et seq.	
19	picture of a gun pointing at you	Argumentative.	
20	saying "either you are with us or		
21	against us". These two websites		
22	also have threatening messages		
23	with the posts from Orly Taitz.		
24	Orly Taitz posts are outlined		
25	below:" Declaration of Lisa		
26	Liberi,¶ 29.		
27			
28			

1	29(a). "June 1, 2011 Orly Taitz 2 posted on her website at 3 <a href="http://www.orlytaitzesq.com?qp=22219">http://www.orlytaitzesq.com?qp=</a> 4 "An order from the 5 Judge... I am still waiting for an 6 answer from the Chief judge 7 McKee from the Third Circuit 8 and from the Philadelphia DA 9 and the US attorney re court 10 reporter Dona Anders, who 11 removed from the certified 12 transcript 14 pages in order to 13 benefit Berg and his assistant, 14 convicted document forger... Lisa 15 Liberi" [Emphasis added] see 16 EXHIBIT "5". Declaration of 17 Lisa Liberi, ¶ 29(a).	18 19 Irrelevant. FRE 401, 402. 20 Speculation. Lacks 21 foundation. No showing of 22 personal knowledge of 23 declarant. FRE 602. 24 Hearsay, and multiple level 25 hearsay. FRE 802 et seq. 26 Vague and ambiguous. 27 Inadmissible opinion 28 Argumentative.	29 Sustained: _____ 30 Overruled: _____
29	30 29(b). June 10, 2011 Orly Taitz 31 posted on her website at 32 <a href="http://www.orlytaitzesq.com?qp=22624">http://www.orlytaitzesq.com?qp=</a> 33 "Latest opposition 34 regarding Philip Berg and his 35 assistant, convicted document 36 forger...Lisa Liberi", [emphasis 37 added] see EXHIBIT "6". 38 ///	39 Irrelevant. FRE 401, 402. 40 Speculation. Lacks 41 foundation. No showing of 42 personal knowledge of 43 declarant. FRE 602. 44 Hearsay, and multiple level 45 hearsay. FRE 802 et seq. 46 Vague and ambiguous. 47 Inadmissible opinion	48 Sustained: _____ 49 Overruled: _____

1	Declaration of Lisa Liberi, ¶ 29(b).	testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “posting” and other acts. Lack of authentication and identification of exhibits. FRE 901 et seq. Argumentative.	Sustained: _____ Overruled: _____
10	29(c). “June 10, 2011 Orly Taitz posted a comment from her supporter on her website at <a href="http://www.orlytaitzesq.com?qp=22638">http://www.orlytaitzesq.com?qp=22638</a> . Taitz supporter states “I hope people like Kreep, Berg, and Liberi learn you are a force they should not mess with.” See EXHIBIT “7”. Declaration of Lisa Liberi, ¶ 29(c).	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “postings” and other acts. Lack of authentication and identification of exhibit.	Sustained: _____ Overruled: _____

1		FRE 901et seq. Argumentative.	
2	29(d). "June 12, 2011, Orly Taitz did an interview with Sharon Rondeau with the Post and Email newspaper. In this article, Orly Taitz falsely accused me of being convicted of 27 counts of forging documents; burglary; multiple convictions for forging documents; that I called Taitz, offered my services; worked for her and stole monies from her and many more false tales, see EXHIBIT "8". Mr. Berg sent a cease and desist and demand for retraction to Ms. Rondeau." Declaration of Lisa Liberi, ¶ 29(d).	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged false accusations and other acts. Lack of authentication and identification of exhibit. FRE 901et seq. Argumentative.	Sustained: _____ Overruled: _____
3	29(e). "June 15, 2011, Orly Taitz posted on her website at <a href="http://www.orlytaitzesq.com/?p=22789">http://www.orlytaitzesq.com/?p=22789</a> "I filed multiple motion to dismiss a frivolous law suit by Berg and Kreep. I've been harassed for 2 years with this	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq.	Sustained: _____ Overruled: _____

1 bogus law suit, where Berg's 2 lead plaintiff and his paralegal 3 Lisa Liberi claimed, that she was 4 defamed, even though she was 5 never defamed, and she is indeed 6 a convicted document 7 forger...with a total of 46 8 criminal charges..." "The Third 9 Circuit Court of Appeals ordered 10 the transferee court to rule on all 11 outstanding motions. So far the 12 judge on the case, Andrew 13 Guilford, did not rule on the 14 merits on one single motion to 15 either dismiss the case or strike it 16 under AntiSLAPP..." What it 17 means, is that when one is filing 18 a frivolous law suit against you, 19 just to harass you and try to 20 silence you as a whistle-blower, 21 stifle your first amendment right 22 to free speech, which is SLAPP- 23 strategic law suit against public 24 participation, a defendant, like 25 myself, who is the real victim, 26 has a right to bring an 27	Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged "posting." Lack of authentication and identification of exhibits. FRE 901et seq. Argumentative.	
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1	a frivolous law suit and get her 2 attorneys fees. For 2 years the 3 federal court system is dragging 4 its feet... The judge in Ca is not 5 ruling on the merits either. I 6 know that since early sixties the 7 court system was used to keep 8 dissidents marred in bogus law 9 suits, but there has to be an end 10 to this." [emphasis added] See 11 EXHIBIT "9" Declaration of 12 Lisa Liberi,¶ 29(e).		
13	29(f). "June 15, 2011 Orly Taitz 14 posted on her website at 15 <a href="http://www.orlytaitzesq.com/?p=22819">http://www.orlytaitzesq.com/?p=22819</a> "Unfortunately, I still 16 have to deal with all the 17 harassment by Berg, Kreep, 18 Liberi, Otella and the court 19 system, which was known to be 20 used as a tool of harassment of 21 dissidents since early 60s Civil 22 rights movement. Clearly, 23 keeping me mired in this aids and 24 abetts Obama", see EXHIBIT 25 "10" Declaration of Lisa 26 Liberi,¶ 29(f).	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged "posting." Lack of authentication and	Sustained: _____ Overruled: _____

1		identification of exhibit.	
2		FRE 901et seq.	
3		Argumentative.	
4	29(g). June 19, 2011, Orly Taitz	Irrelevant. FRE 401, 402.	Sustained: _____
5	posted on her website at	Speculation. Lacks	Overruled: _____
6	<a href="http://www.orlytaitzesq.com/?p=22970">http://www.orlytaitzesq.com/?p=22970</a> “People like attorneys	foundation. No showing of personal knowledge of declarant. FRE 602.	
7	Gary Kreep and Philip Berg, who	Hearsay, and multiple level	
8	claim to be on the same side... for	hearsay. FRE 802 et seq.	
9	the last two years, but harass me	Vague and ambiguous.	
10	with thousands of pages of	Inadmissible opinion	
11	defamation of my character in	testimony. FRE 701 et seq.	
12	frivolous law suits. They attack	Assumes facts not in	
13	me and my husband, where the	evidence, and no	
14	only reasonable inference is, that	foundation, regarding	
15	their goal is not to go after	alleged “posting.” Lack of	
16	Obama, but to go after me and	authentication and	
17	my whole family, in order to	identification of exhibits.	
18	deplete us out of money, time	FRE 901et seq.	
19	and emotional resources needed	Argumentative.	
20	to fight Obama. Unfortunately		
21	our court systems allows them to		
22	do it for over 2 years now. Not		
23	one judge so far took the time to		
24	actually read the garbage of a		
25	complain written by Berg and his		
26	assistant, convicted document		
27			
28			

1 forger ... Lisa Liberi, and actually  
2 read the motion to dismiss and  
3 rule on those on the merits. They  
4 summarily deny without  
5 prejudice and allow a criminal  
6 and her unethical attorneys, Berg  
7 and Kreep to continue harassing  
8 me, my husband, investigator  
9 Sankey with a bogus law suit,  
10 where they claim that they were  
11 defamed, even though they were  
12 never defamed. Now after 2  
13 years of litigation, CA judge  
14 Andrew Guilford allowed Berg  
15 to amend his initial complaint,  
16 which should have been  
17 dismissed and instead of 87  
18 complaint, he allowed Berg and  
19 Kreep bring a 200 page  
20 complaint full of complete  
21 garbage, even though by CA law  
22 this judge was supposed to  
23 actually read the first complaint,  
24 read antiSLAPP motion and  
25 decide on the merits on the  
26 motion, which would have ended  
27 this harassment by Berg and

28

1	Kreep and their associates. I		
2	probably could do twice the		
3	amount of work I am doing now,		
4	fighting Obama, if not for the		
5	time and money I have to spend		
6	fighting Obots and fighting Berg		
7	and Kreep, who are worse, than		
8	all the obots, taken together."		
9	[emphasis added] See EXHIBIT		
10	"11" Declaration of Lisa		
11	Liberi, ¶ 29(g).		
12	29(h). "June 21, 2011, Orly	Irrelevant. FRE 401, 402.	Sustained: _____
13	Taitz posted on her website at	Speculation. Lacks	Overruled: _____
14	<a href="http://www.orlytaitzesq.com/?p=23043">http://www.orlytaitzesq.com/?p=23043</a> ;	foundation. No showing of personal knowledge of declarant. FRE 602.	
15	<a href="http://www.orlytaitzesq.com/?attachment_id=23044">http://www.orlytaitzesq.com/?attachment_id=23044</a> ;	Hearsay, and multiple level	
16	<a href="http://www.orlytaitzesq.com/?attachment_id=23045">http://www.orlytaitzesq.com/?attachment_id=23045</a> ; my family	hearsay. FRE 802 et seq.	
17	picture, a single picture of me	Vague and ambiguous.	
18	that she calls a "mug" shot, some	Inadmissible opinion	
19	documents which Taitz's claims I	testimony. FRE 701 et seq.	
20	put a "hit" on my sister; and the	Assumes facts not in	
21	print-out which Orly Taitz calls a	evidence, and no	
22	"criminal record" and "rap sheet"	foundation, regarding	
23	along with following post "I got	alleged "false statements"	
24	an e-mail and a call from Sharon	and other acts. Lack of	
25		authentication and	
26			
27			
28			

1 Rondeau, editor of "Post and E-  
2 mail" where she stated that she  
3 received a letter and phone call  
4 from Phil Berg and Lisa Liberi.  
5 Berg and Liberi attempted to  
6 harass and threaten Ms. Rondeau,  
7 demanding that she remove an  
8 article about them... she does not  
9 cave in, when people harass and  
10 threaten her." "Gary Kreep  
11 teamed up with Berg, as his local  
12 CA counsel in harassing me, and  
13 trying to extort money from me  
14 and my husband via a frivolous  
15 bogus law suit, filed by Berg,  
16 Liberi and Ostella. They are also  
17 harassing with the same bogus  
18 law suit investigator Sankey as  
19 well as database companies Lexis  
20 Nexis and Intellius, which  
21 provided us information  
22 regarding Obama and Obama's  
23 fraudulent use of CT SSN 042-  
24 68-4425. You tell me, on whose  
25 side are Gary Kreep and Philip  
26 Berg? The biggest problem here,  
27 as with Obama cases, is that the

identification of exhibit.  
FRE 901et seq.  
Argumentative.

28

1	judges have all this information 2 and allow this to go on." See 3 EXHIBIT "12", there are many 4 more false statements in this 5 article as well." Declaration of 6 Lisa Liberi, ¶ 29(h).		
7	29(I). "June 23, 2011 Orly Taitz 8 posted on her website at 9 <a href="http://www.orlytaitzesq.com/?p=23174">http://www.orlytaitzesq.com/?p=</a> 10 <u>23174</u> "I have to spend hundreds 11 of hours dealing with hundreds 12 of pages of harassment of me, 13 which are coming from Berg and 14 Kreep and Liberi and Ostella", 15 see EXHIBIT "13". Declaration 16 of Lisa Liberi, ¶ 29(I).	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged "posting." Lack of authentication and identification of exhibit. FRE 901 et seq. Argumentative.	Sustained: _____ Overruled: _____
25	29(j). "June 25, 2011, Orly Taitz 26 posted on her website at 27 <a href="http://www.orlytaitzesq.com/?p=23227">http://www.orlytaitzesq.com/?p=</a> 28 <u>23227</u> Orly Taitz states "Please,	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of	Sustained: _____ Overruled: _____

1	read this article by the editor of	declarant. FRE 602.	
2	Post and E-mail. The same way	Hearsay, and multiple level	
3	as Philip Berg is harassing me,	hearsay. FRE 802 et seq.	
4	my husband, investigator Sankey,	Vague and ambiguous.	
5	companies provided Obama's	Inadmissible opinion	
6	SSN, he is now harassing editor	testimony. FRE 701 et seq.	
7	of "Post & Email" for providing	Assumes facts not in	
8	truthful information about him	evidence, and no	
9	and his associates. It is time for	foundation, regarding	
10	our courts to start doing their job	alleged "posting." Lack of	
11	and stopping such behavior."	authentication and	
12	"Gary Kreep is Berg's local	identification of exhibit.	
13	California counsel on the case.	FRE 901et seq.	
14	According to the code of	Argumentative.	
15	professional ethics Kreep had to		
16	do minimal investigation before		
17	singing up as co-counsel on the		
18	case. If Gary Kreep were to do		
19	minimal investigation, and were		
20	to check Liberi's 87 page		
21	criminal record in the superior		
22	court of San Bernardino County		
23	CA, he would know, that Berg,		
24	Liberi and Ostella are the ones,		
25	who engaged in harassment		
26	Liberi and Ostella are the ones,		
27	who engaged in harassment and		
28			

1       bullying. It was unethical for  
2       Kreep to sign up on this case. If  
3       you look at the people, that they  
4       are harassing those are the ones,  
5       who are at the forefront of  
6       fighting Obama... For two years  
7       I've been filing motions to  
8       dismiss. The courts did not rule  
9       with prejudice, meaning that they  
10      did not rule on the merits of these  
11      motions and are allowing this  
12      harassment to go on for 2 years,  
13      even though prior judge on the  
14      case, Eduardo Robreno, has  
15      written in his opinion, that Berg,  
16      Liberi and Ostella were not  
17      believable as witnesses... Since  
18      the civil rights movement of the  
19      60s the court system was used for  
20      harassment of civil rights leaders  
21      and dissidents against the  
22      establishment. I am afraid, that  
23      this is the true reason, why this  
24      case lingers in courts for two  
25      years. Hundreds of attorneys  
26      who read the case, the complaint  
27      and the evidence are horrified at

28

1 what is happening in the court  
2 system, how such garbage is  
3 allowed to linger for 2 years, why  
4 Berg is not sanctioned or  
5 disbarred for fraud on the court,  
6 for bringing a bogus complaint,  
7 claiming that he and his assistant  
8 were defamed, that she is an  
9 innocent woman, residing in PA,  
10 while he knew, that she is indeed  
11 a felon, who had 46 criminal  
12 charges of..burglary...At the  
13 time he filed this case, he knew,  
14 that she was nowhere near PA,  
15 that she was on probation and  
16 that it was a totally bogus law  
17 suit filed for purpose of  
18 harassment and bullying. It is  
19 shocking that the judges are  
20 allowing this to go on for two  
21 years, without dismissing the  
22 case and sanctioning Berg for  
23 fraud, for bullying and  
24 harassment. Att. Philip J. Berg  
25 Accuses the Post & Email of  
26 Libel and Slander; Threatens to  
27 Sue The Post & Email

28

1	thepostemail.com/2011/06/25/at		
2	t-philip-j-berg-		
3	ac...97.74.144.93," see EXHIBIT		
4	"14" Declaration of Lisa		
5	Liberi, ¶ 29(j).		
6	29(k). "June 26, 2011 Orly Taitz	Irrelevant. FRE 401, 402.	Sustained: _____
7	posted on her webiste at	Speculation. Lacks	Overruled: _____
8	<a href="http://www.orlytaitzesq.com/?p=23263">http://www.orlytaitzesq.com/?p=23263</a> the following "I am	foundation. No showing of	
9	providing information showing	personal knowledge of	
10	retaliation by the regime against	declarant. FRE 602.	
11	the civil rights and dissident	Hearsay, and multiple level	
12	opposition leaders like me. I am	hearsay. FRE 802 et seq.	
13	providing information about	Vague and ambiguous.	
14	psyops used from the 60 civil	Inadmissible opinion	
15	rights movement, use of known	testimony. FRE 701 et seq.	
16	criminals and use of courts to	Assumes facts not in	
17	attack the leaders of opposition	evidence, and no	
18	with bogus law suits to waste	foundation, regarding	
19	their time and financial resources	alleged "posting." Lack of	
20	and keep them unable to fight the	authentication and	
21	regime. I am bringing as an	identification of exhibits.	
22	example a bogus law suit filed by	FRE 901et seq.	
23	attorneys Philip Berg and Gary	Argumentative.	
24	Kreep, where they bring as a lead		
25	plaintiff a convicted thief and		
26	forger Lisa Liberi, claiming that		
27			
28			

1 she was defamed, even though  
2 she was never defamed and all of  
3 the information about her was  
4 truthful. For two years now  
5 multiple federal courts are  
6 refusing to rule on the merits of  
7 the motions to dismiss simply to  
8 keep me occupied and unable to  
9 go after Obama. I am bringing  
10 forward information of the courts  
11 covering up Obstruction of  
12 Justice by the court employees.  
13 Court reporter Dona Anders in  
14 the Eastern district of PA  
15 forward to me a certified copy of  
16 the transcript, where she  
17 attempted to aid Liberi and Berg  
18 by removing 14 pages of  
19 testimony, which would be  
20 highly detrimental to Liberi and  
21 Berg...Chief judge of the Third  
22 Circuit Judge McKee simply  
23 buried the complaint. No action  
24 was taken by the District  
25 Attorney of Philadelphia, US  
26 attorney or inspector  
27 general...When the courts refuse

28

1	to act, when the courts allow		
2	themselves to be tools of		
3	harassment, legal extortion, when		
4	court employees are engaged in		
5	obstruction of justice, spoliation		
6	of evidence, tampering with		
7	evidence and the judges are		
8	looking the other way, that is a		
9	sign of tyranny and total lack of		
10	human rights in the United States		
11	of America. It is time for the		
12	world community and the US		
13	citizens to address violations of		
14	human rights in the U.S. during		
15	the Obama regime.” See		
16	EXHIBIT “15”. Declaration of		
17	Lisa Liberi, ¶ 29(k).		
18	29(l). “June 29, 2011, Orly Taitz	Irrelevant. FRE 401, 402.	Sustained: _____
19	posted on her website at	Speculation. Lacks	Overruled: _____
20	<a href="http://www.orlytaitzesq.com/?p=23326">http://www.orlytaitzesq.com/?p=23326</a>	foundation. No showing of	
21	my family photograph, a	personal knowledge of	
22	single picture of me that Taitz	declarant. FRE 602.	
23	calls a “mug shot”, and the print-	Hearsay, and multiple level	
24	out which Taitz’s calls my	hearsay. FRE 802 et seq.	
25	“criminal record” and “criminal	Vague and ambiguous.	
26	rap sheet” along with the	Inadmissible opinion	
27	following “I need your help in	testimony. FRE 701 et seq.	
28			

1	getting media in the courtrooms”	Assumes facts not in	
2	I need as any media outlets as	evidence, and no	
3	possible covering, what is going	foundation, regarding	
4	on in the courtroom of judge	alleged “posting.” Lack of	
5	Andrew Guilford, Central	authentication and	
6	District of CA, Santa Ana (same	identification of exhibits.	
7	district, where judge Carter is	FRE 901et seq.	
8	working), where I, investigator	Argumentative.	
9	Sankey, database companies		
10	Choice Point, Lexis Nexis,		
11	Intelius (all the companies, that		
12	supplied me with Obama’s social		
13	security numbers) and even		
14	Oracle are being harassed with a		
15	bogus law suit brought by Philip		
16	Berg and his local CA counsel		
17	Gary krepid, (both of claim to be		
18	on our side) whose lead plaintiff		
19	is Lisa Rene Richardson Liberi,		
20	...Liberi is Berg’s assistant,		
21	drafting pleadings for him. The		
22	case was filed for defamation,		
23	libel and assault. They tried to		
24	create an illusion, that Lisa		
25	Liberi is a different person, not		
26	one convicted in Ca but some		
27	other Liberi residing in PA.		
28			

1 AntiSLAPP (this is a special CA  
2 motion brought to dismiss bogus  
3 law suits, which were brought to  
4 try to silence the whistleblowers,  
5 to affect the right of the public to  
6 exercise their free speech.  
7 Without even addressing a work  
8 of the initial 85 page complaint  
9 or a work or a single argument of  
10 the motion to dismiss, after the  
11 answer to the complaint was  
12 already filed and the case was  
13 litigated for 2 years, judge  
14 Guilford summarily denied the  
15 motion to dismiss and allowed  
16 Berg, Kreep, Liberi and Ostella  
17 to file an amended complaint (a  
18 new complaint, which is 197  
19 pages of complete garbage.)  
20 Now instead of working on  
21 removing usurper Obama from  
22 office, I need to waste an  
23 enormous amount of time,  
24 dealing with a new avalanche of  
25 garbage. I filed an appeal of  
26 Guilford's decision and also  
27 requested a leave of court to file  
28

1 an antiSLAPP motion to dismiss  
2 the amended complaint. No  
3 answer from Guilford yet,  
4 whether he will allow  
5 AntiSLAPP of the amended  
6 complaint, and if he does,  
7 whether he will dismiss the  
8 amended complaint on Ca  
9 AntiSLAPP. Additionally if  
10 within 2 years not Judge Robreno  
11 in Philadelphia, not the Third  
12 Circuit Court of Appeals, not  
13 judge Guilford took time to even  
14 read the initial 85 page complaint  
15 and see what kind of garbage it  
16 was, how can I expect any justice  
17 going forward. What is the point  
18 of bringing forward hundreds of  
19 pages of evidence and argument  
20 if within 2 years not one single  
21 judge took the time to read them  
22 and rule with prejudice (meaning  
23 on the merits). They simply  
24 allowed a criminal, who is a  
25 vexatious plaintiff and her  
26 unethical attorney, whose actions  
27 are bordering on criminal, to

28

1	harass me nonstop..." See		
2	EXHIBIT "16". Orly Taitz also		
3	had this post with pictures posted		
4	on		
5	<a href="http://www.skypeassholes.com">http://www.skypeassholes.com</a> ,		
6	see EXHIBIT "17".' Declaration		
7	of Lisa Liberi,¶ 29(l).		
8	29(m). "June 29, 2011, Orly	Irrelevant. FRE 401, 402.	Sustained: _____
9	Taitz posted on her website at	Speculation. Lacks	Overruled: _____
10	<a href="http://www.orlytaitzesq.com/?p=23350">http://www.orlytaitzesq.com/?p=23350</a> "There will be media	foundation. No showing of	
11	present at the court hearing in	personal knowledge of	
12	Liberi v Taitz, so the public can	declarant. FRE 602.	
13	see all the certified records,	Hearsay, and multiple level	
14	showing that Liberi was indeed	hearsay. FRE 802 et seq.	
15	convicted of forgery and theft,	Vague and ambiguous.	
16	there was no defamation, no	Inadmissible opinion	
17	harassment, and Berg and Kreep	testimony. FRE 701 et seq.	
18	are harassing me with a totally	Assumes facts not in	
19	bogus law suit and preventing me	evidence, and no	
20	from spending time on Obama	foundation, regarding	
21	litigation" See EXHIBIT "18".' Declaration of Lisa Liberi,¶	alleged "posting." Lack of	
22	29(m).	authentication and	
23		identification of exhibit.	
24		FRE 901et seq.	
25		Argumentative.	
26			
27			
28			

1	29(n). "July 5, 2011, Orly Taitz	Irrelevant. FRE 401, 402.	Sustained: _____
2	posted on her website at	Speculation. Lacks	Overruled: _____
3	<a href="http://www.orlytaitzesq.com/?p=23386">http://www.orlytaitzesq.com/?p=</a>	foundation. No showing of	
4	<u>23386</u> "At the same time Berg	personal knowledge of	
5	and Kreep, who claim to be	declarant. FRE 602.	
6	patriots continue harassing me	Hearsay, and multiple level	
7	with a bogus law suit, claiming	hearsay. FRE 802 et seq.	
8	that I owe them and their client	Vague and ambiguous.	
9	convicted criminal Lisa Liberi	Inadmissible opinion	
10	3 billion dollars for defamation and	testimony. FRE 701 et seq.	
11	invasion of privacy, even though	Assumes facts not in	
12	she was never defamed, the	evidence, and no	
13	woman indeed had 27 criminal	foundation, regarding	
14	charges in Ca, her sister reported	alleged "posting." Lack of	
15	to the police 19 prior criminal	authentication and	
16	charges...All of her information	identification of exhibits.	
17	came from public records. This	FRE 901et seq.	
18	complete garbage was supposed	Argumentative.	
19	to be dismissed a long time ago,		
20	but the courts allow them to		
21	continue harassing e for 2 years,		
22	judges simply don't take the time		
23	to read the complaint and the		
24	motions to dismiss, AntiSLAPP		
25	motions and end this harassment,		
26	so I have to waste hundreds and		
27	hundreds of hours and hundreds		
28			

1	of dollars instead of spending		
2	this time on prosecuting		
3	ObamaFraudGate, which is the		
4	number one crime in the country		
5	today or ever." See EXHIBIT		
6	"19". Orly Taitz also had this		
7	posted on		
8	<a href="http://domesticenemies.net">http://domesticenemies.net</a> with a		
9	threatening message, see		
10	EXHIBIT "20" and on		
11	<a href="http://www.skypeassholes.com">http://www.skypeassholes.com</a> ,		
12	see EXHIBIT "21". The		
13	comment regarding my sister is		
14	completely untrue as I did not		
15	have nineteen previous charges		
16	against me, for my sister or		
17	anyone else to disclose. My		
18	sister died in 2005. I did not		
19	have 27 counts or charges against		
20	me at any time either."		
21	Declaration of Lisa Liberi, ¶		
22	29(n).		
23	29(o). "July 10, 2011, Orly Taitz	Irrelevant. FRE 401, 402.	Sustained: _____
24	posted on her website at	Speculation. Lacks	Overruled: _____
25	<a href="http://www.orlytaitzesq.com/?p=23721">http://www.orlytaitzesq.com/?p=23721</a> an article written by	foundation. No showing of	
26	MinutemanCDC_SC on behalf of	personal knowledge of	
27		declarant. FRE 602.	
28			

1	the tea party nation on her behalf	Hearsay, and multiple level	
2	based on her false tales about me,	hearsay. FRE 802 et seq.	
3	the following “Discredited” is	Vague and ambiguous.	
4	not an accurate “diss” against	Inadmissible opinion	
5	Mrs. Taitz. She has been	testimony. FRE 701 et seq.	
6	discounted, disrespected,	Assumes facts not in	
7	disclaimed, disallowed,	evidence, and no	
8	disapproved of, disbelieved,	foundation, regarding	
9	discarded, discharged by a client	alleged “posting.” Lack of	
10	or two, discriminated against for	authentication and	
11	her Moldovan accent, disdained	identification of exhibit.	
12	for her law school credentials,	FRE 901et seq.	
13	disjoined (wrongly) by Lisa	Argumentative.	
14	Liberi and Atty. Phil Berg,		
15	disfavored, disliked, dishonored,		
16	dislodged from her place of		
17	comfort and respect in Beverly		
18	Hills, dismissed as a legal		
19	lightweight (the opposite of an		
20	unlawful heavy, I suppose),		
21	disowned by some supporters		
22	and defenders of the Constitution		
23	for circumventing their		
24	“lawyers’ unwritten code of		
25	conduct,” disparaged and		
26	distorted by the Lamestream		
27	Media, frequently and rudely		
28			

1	disrupted by her opponents, and		
2	dispatched, dispelled, dispersed,		
3	displaced, disobliged, dispensed		
4	with, disposed of, and disserved		
5	by numerous judges, who appear		
6	to want to put this “not-one-of-		
7	our-kind” upstart in her place.”		
8	See EXHIBIT “22”. The		
9	minutemen are a group of		
10	individuals who are against		
11	illegal immigration in America.”		
12	Declaration of Lisa Liberi, ¶		
13	29(o).		
14	29(p). July 22, 2011, After this	Irrelevant. FRE 401, 402.	Sustained: _____
15	Court sanctioned Defendant Orly	Speculation. Lacks	Overruled: _____
16	Taitz and her Attorney’s Orly	foundation. No showing of	
17	Taitz immediately refilled yet	personal knowledge of	
18	another document which she	declarant. FRE 602.	
19	called a “Reconsideration” and a	Hearsay, and multiple level	
20	“Letter seeking Leave”. This	hearsay. FRE 802 et seq.	
21	document falsely accuses the	Vague and ambiguous.	
22	Plaintiffs of being “dangerous	Inadmissible opinion	
23	criminals”; of violating this	testimony. FRE 701 et seq.	
24	Court’s Orders; falsely stating	Assumes facts not in	
25	that I had 46 felony criminal	evidence, and no	
26	counts against me; falsely	foundation, regarding	
27	implying this Court is being	alleged “postings.” Lack of	
28			

1	prejudicial, etc. Orly Taitz filed 2 this document as a press release. 3 Orly Taitz, as an Attorney, is 4 mindful that her supporters, 5 readers and followers are “lay” 6 people and do not understand the 7 law. Orly Taitz knows they will 8 believe what she states. Orly 9 Taitz used this Court’s docket to 10 further substantiate her postings 11 to her followers, readers and 12 supporters to arouse their 13 emotions. Orly Taitz published 14 this document on her website at 15 <a href="http://www.orlytaitzesq.com/?p=24049">http://www.orlytaitzesq.com/?p=</a> 16 <a href="http://www.orlytaitzesq.com/?attachment_id=24048">24049</a> , see EXHIBIT “23” at 17 <a href="http://www.orlytaitzesq.com/?attachment_id=24048">http://www.orlytaitzesq.com/?att</a> 18 <a href="http://www.orlytaitzesq.com/wp-">achment id=24048</a> and at 19 <a href="http://www.orlytaitzesq.com/wp-content/uploads/2011/07/Liberi-">http://www.orlytaitzesq.com/wp-</a> 20 <a href="http://www.orlytaitzesq.com/wp-content/uploads/2011/07/Liberi-">content/uploads/2011/07/Liberi-</a> 21 <a href="http://www.orlytaitzesq.com/wp-content/uploads/2011/07/Liberi-">v-Taitz-final-request-for-</a> 22 <a href="http://www.orlytaitzesq.com/wp-content/uploads/2011/07/Liberi-">reconsideration.pdf</a> , see 23 EXHIBIT “24”. Declaration of 24 Lisa Liberi, ¶ 29(p).	authentication and identification of exhibits. FRE 901et seq. Argumentative.	
25	29(q). “July 22, 2011 Orly Taitz 26 posted on her website the Motion 27 to Dismiss on behalf of Orly	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of	Sustained: _____ Overruled: _____

28

1	Taitz, Inc. which she filed with 2 this Court on July 19, 2011 and 3 one of the documents she was 4 sanctioned by this Court for 5 filing without Leave of Court. 6 This document contains many 7 false statements and accusations 8 about Plaintiffs. After Orly Taitz 9 was Sanctioned, she published 10 this document on her website at 11 <a href="http://www.orlytaitzesq.com/?p=24052">http://www.orlytaitzesq.com/?p=24052</a> , see EXHIBIT "25" and 12 on her website at 13 <a href="http://www.orlytaitzesq.com/?attachment_id=24051">http://www.orlytaitzesq.com/?attachment_id=24051</a> and 14 <a href="http://www.orlytaitzesq.com/wp-content/uploads/2011/07/Liberi-v-Taits-motion-to-dismiss-by-Orly-Taitz-inc.pdf">http://www.orlytaitzesq.com/wp-content/uploads/2011/07/Liberi-v-Taits-motion-to-dismiss-by-Orly-Taitz-inc.pdf</a> Declaration of 15 Lisa Liberi, ¶ 29(q).	personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged "posting." Lack of authentication and identification of exhibit. FRE 901 et seq. Argumentative.	
21	30 (mistakenly labeled "29"). 22 "The most recent threatening 23 posts outlined above have been 24 reported to my local law 25 enforcement authorities." 26 Declaration of Lisa Liberi, ¶ 30 27 (mistakenly labeled "29").	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq.	Sustained: _____ Overruled: _____

1		Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding the alleged “posts” and threats. Argumentative.	
9	31 (mistakenly labeled “30”).  “Orly Taitz also published all the above posts on her accounts with Facebook (in approximately 8 places on Facebook);  beforeitsnews.com; friends feed; twitter; freedables.com; and other social network sites and search engines including internationally and in foreign languages. We have copies and all the links should the Court wish them to be filed. Orly Taitz also sent these posts through hundreds of RSS feeds to thousands of websites for posting.” Declaration of Lisa Liberi, ¶ 31 (mistakenly labeled “30”).	Irrelevant. FRE 401, 402.  Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602.  Hearsay, and multiple level hearsay. FRE 802 et seq.  Vague and ambiguous.  Inadmissible opinion testimony. FRE 701 et seq.  Assumes facts not in evidence, and no foundation, regarding alleged “posts.” Lack of identification of documents referred to. FRE 901 et seq.  Argumentative.	Sustained: _____  Overruled: _____

27  
28

1	32 (mistakenly labeled "31").	Irrelevant. FRE 401, 402.	Sustained: _____
2	"There is absolutely no	Speculation. Lacks	Overruled: _____
3	permissible purpose, no tangible	foundation. No showing of	
4	reason for all these postings	personal knowledge of	
5	regarding me, Lisa Ostella or our	declarant. FRE 602.	
6	attorney's and it does not serve	Hearsay, and multiple level	
7	any legitimate purpose. All these	hearsay. FRE 802 et seq.	
8	postings since 2009 have kept me	Vague and ambiguous.	
9	living in daily fear for myself,	Inadmissible opinion	
10	son and husband. Further, it has	testimony. FRE 701 et seq.	
11	caused me and my family severe	Assumes facts not in	
12	(substantial) emotional and	evidence, and no	
13	mental distress to the point I	foundation, regarding	
14	ended up hospitalized for heart	alleged "postings." Lack of	
15	complications due to the stress	authentication and	
16	and repeated emergency	identification of exhibits.	
17	personnel at my home due to	FRE 901et seq.	
18	heart complications and other	Argumentative.	
19	medical complications caused by		
20	the harassment and stress."		
21	Declaration of Lisa Liberi, ¶ 32		
22	(mistakenly labeled "31").		
23	33 (mistakenly labeled "32").	Irrelevant. FRE 401, 402.	Sustained: _____
24	"All of the above posts I obtained	Speculation. Lacks	Overruled: _____
25	by going directly to Orly Taitz	foundation. No showing of	
26	website at <a href="http://www.orlytaitzesq.com">www.orlytaitzesq.com</a>	personal knowledge of	
27	and in the search box typing	declarant. FRE 602.	
28			

1	“Liberi” each and every post with my name came up, at which time I took a screen shot and printed the page to PDF. The above 17 exhibits are only over the past 1- 1/2 months and is the same posting Orly Taitz has done regarding me since April 2009, all with false tales, false allegations, where I am being blamed for what Orly Taitz is actually doing to us.” Declaration of Lisa Liberi, ¶ 33 (mistakenly labeled “32”).	Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding alleged “posts” and “false tales” and “false allegations.” Lack of identification of documents referred to. FRE 901 et seq. Argumentative.	
15	34 (mistakenly labeled “33”). “Orly Taitz incites people against us, as proven by the postings by her own web person, Bob Stevens on <a href="http://www.skypeassholes.com">www.skypeassholes.com</a> and <a href="http://domesticenemies.net">http://domesticenemies.net</a> , as well as Taitz own statements. I certainly believe this justifies and substantiates her cyber-stalking of me and Lisa Ostella. Declaration of Lisa Liberi, ¶ 34 (mistakenly labeled “33”).	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence, and no foundation, regarding	Sustained: _____ Overruled: _____

1		alleged “postings.”	
2		Argumentative.	
3	35 (mistakenly labeled “34”).	Irrelevant. FRE 401, 402.	Sustained: _____
4	“Your Honor, Orly Taitz will not	Speculation. Lacks	Overruled: _____
5	stop until the Court’s force her to	foundation. No showing of	
6	stop her illegal and damaging	personal knowledge of	
7	conduct.” Declaration of Lisa	declarant. FRE 602.	
8	Liberi, ¶ 35 (mistakenly labeled	Hearsay. FRE 802 et seq.	
9	34).	Vague and ambiguous.	
10		Inadmissible opinion	
11		testimony. FRE 701 et seq.	
12		Assumes facts not in	
13		evidence, and no	
14		foundation, regarding	
15		alleged “illegal and	
16		damaging conduct.”	
17		Argumentative.	

18  
19        **B.     *Objections to Declaration of Plaintiff, Lisa Ostella***  
20        **EVIDENTIARY OBJECTIONS**

21	<b>DECLARATION OF</b> <b>PLAINTIFF, LISA LIBERI</b>	<b>MOVING</b> <b>DEFENDANT’S</b> <b>OBJECTIONS</b>	<b>COURT’S</b> <b>RULING</b>
24	1.“I worked in several companies during my years that required teaching others how to use software applications. My business, Go Excel Global, also	Irrelevant. FRE 401, 402. Inadmissible opinion testimony. FRE 701 et. seq. Hearsay. FRE 802 et seq. Vague and ambiguous.	Sustained: _____ Overruled: _____

1	taught classes at a Chamber of	Argumentative. No	
2	Commerce to small business how	foundation regarding Orly	
3	to compete with big box stores	Taitz' alleged computer	
4	through eCommerce. People I've	skills. Speculation.	
5	taught that don't know how to		
6	use computers behave quite		
7	differently than Orly Taitz,		
8	herein often referred to as		
9	"Taitz." People that don't know		
10	how to use computers need their		
11	hand held in understanding the		
12	difference between personal		
13	computer functions versus		
14	Internet functions. This is not		
15	the case with Orly Taitz. Taitz is		
16	malingering for creating		
17	plausible deniability."		
18	Declaration of Lisa Ostella, ¶ 1.		
19	2. "When I first started working	Hearsay. FRE 802 et. seq.	Sustained: _____
20	with Taitz in fall 2008, she	Irrelevant. FRE 401, 402.	Overruled: _____
21	brought to the table that her	Inadmissible opinion	
22	business website, drtaitz.com,	testimony. FRE 701 et. seq.	
23	was hacked by "Obama thugs"	Speculation. No	
24	and wanted that posted at	foundation for Orly Taitz'	
25	drorly.blogspot.com where I was	"lies". Argumentative.	
26	her assistant webmaster. I did	Vague and ambiguous.	
27	not want that posted until it was		
28			

1	investigated. Taitz was very		
2	allusive during all my questions		
3	to find out what happened to		
4	drtaitz.com. In the end of my		
5	investigations, it turned out she		
6	lied. Her husband, Yosef Taitz,		
7	set up the site drtaitz.com and		
8	Taitz took her own domain off		
9	the virtual host for the site.”		
10	Declaration of Lisa Ostella, ¶ 2.		
11	3. “Next, Taitz wanted a PayPal	Irrelevant. FRE 401, 402.	Sustained: _____
12	account set up for Defend Our	Speculation. Lacks	Overruled: _____
13	Freedoms Foundation, December	foundation. No showing of	
14	2008. She told me she didn’t	personal knowledge of	
15	know how to do it because she	declarant. FRE 602.	
16	never had a PayPal account	Hearsay. FRE 802 et. seq.	
17	before. This was another lie.	Inadmissible opinion	
18	One of the problems I	testimony. FRE 701 et. seq.	
19	encountered in setting up the	No foundation regarding	
20	PayPal account was her email;	alleged “lie.” Lack of	
21	<a href="mailto:dr_taitz@yahoo.com">dr_taitz@yahoo.com</a> was already	authentication and	
22	associated with a PayPal account.	identification of exhibit.	
23	She, or Yosef Taitz, had set up a	FRE 901 et. seq.	
24	PayPal for her personal use in		
25	October 2008. Therefore, Bob		
26	Stevens, her head webmaster,		
27	had to set up gmail e-mail		
28			

1	accounts for her in order to 2 continue the set up of her new 3 PayPal account because PayPal 4 does not allow emails to be 5 associated with more than one 6 account, see PayPal Records 7 attacked as Exhibits "22" and 8 "23", Docket number 190-5 and 9 Understanding the Internet, 10 PayPalGate, see Plaintiffs 11 ORiginal complaint, filed May 4, 12 2009, Docket number 1 at pages 13 13 through 15, paragraphs 44-52; 14 and Affidavit of Lisa Ostella 15 filed August 27, 2009, Docket 16 number 107-1, pages 17-32. 17 Declaration of Lisa Ostella, ¶ 3.		
18	4. "While working as an 19 assistant at drorly.blogspot.com, 20 Taitz kept very close monitoring 21 of what comments were allowed 22 from people posted under her 23 articles on her blog. Her head 24 webmaster, Bob Stevens, not real 25 name; but the name I knew him 26 by, set up a 3 <sup>rd</sup> party program JS- 27 Kit by HaloScan so Taitz would	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in	Sustained: _____ Overruled: _____

1	have an easier time blocking 2 people by Ips. When Taitz's 3 blog started redirecting to porn 4 sites and trying to force 5 command downloads on my 6 computer, I signed into her gmail 7 account. There was the link to 8 the control panel for her JS-Kit 9 controls. I went to the control 10 panel to investigate the problems 11 we were having on the 12 drorly.blogspot.com. See 13 Plaintiffs Original complaint, 14 filed May 4, 2009, Docket 15 number 1 at pages 13 through 15, 16 paragraphs 44-52; and Affidavit 17 of Lisa Ostella filed August 27, 18 2009, Docket number 107-1, 19 pages 17 through 32.” 20 Declaration of Lisa Ostella, ¶ 4.	evidence, and no foundation, regarding alleged reason for setting up a “3 <sup>rd</sup> party program JS- Kit by HaloScan.” Lack of authentication and identification of exhibit. FRE 901 et. seq.	
21	5. “I was overwhelmed by all the 22 data I saw that this JS-Kit was 23 collecting. There were multiple 24 panel views everywhere much 25 like an FTP program. Data was 26 being collected on blog visitors 27 and uploaded to a different	Irrelevant. FRE 401, 402. Hearsay. FRE 802 et seq. Vague and ambiguous. Lacks foundation. Speculation. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: _____ Overruled: _____

1	server. This was all under the 2 control of Taitz's control panel. 3 This was not someone who did 4 not understand computers, let 5 alone the Internet." Declaration 6 of Lisa Ostella, ¶ 5.		
7	6. "Taitz came over to sue my 8 blog site, still protesting she had 9 no idea about anything I had 10 found. She blamed it all on Bob 11 Stevens. I gave her access to my 12 blog for her to post and monitor 13 comments. Taitz right away 14 settled in and was using features 15 in my blog control panel that I 16 had never used. She was using 17 the blog as a private mail relay, 18 remote blogging and email 19 blogging all set up without any 20 need for me to give her a tour of 21 the blogcast control panel.  22 Please note this blogcast site 23 was different software than the 24 blogspot software and had 25 different features. Taitz would 26 also setup posts that she would 27 keep and want left in draft as	Irrelevant. FRE 401, 402. Hearsay. FRE 802 et seq. Lacks foundation. Vague and ambiguous.  Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence. No showing of personal knowledge of declarant regarding whether Ms. Taitz was the one to "setup posts that she would keep and want left in draft as well as posts with unusual Google Tags."  Argumentative.	Sustained: _____  Overruled: _____
28			

1	well as posts with unusual		
2	Google Tags, such as:		
3	‘googlea72548778058f8bc.html’		
4	and I would never get an		
5	explanantion as to what these set		
6	ups were for. All of these		
7	behaviors led me further to		
8	believe that her statements that		
9	she did not understand computers		
10	was inaccurate.” Declaration of		
11	Lisa Ostella,¶ 6.		
12	7. “Also, Taitz had no problems	Irrelevant. FRE 401, 402.	Sustained: _____
13	utilizing VOIP or video	Speculation. Lacks	Overruled: _____
14	conferencing. She video	foundation. Hearsay. FRE	
15	conferenced multiple interviews	802 et seq.	
16	as well as sat in on Citizen Grand		
17	Juries remotely.” Declaration of		
18	Lisa Ostella,¶ 7.		
19	8. “Even observing her Intenet	Irrelevant. FRE 401, 402.	Sustained: _____
20	activity as an outsider now, Taitz	Speculation. Lacks	Overruled: _____
21	is utilizing developer tools with	foundation. No showing of	
22	Facebook to thread all of her site	personal knowledge of	
23	activity for her blogs and social	declarant. FRE 602.	
24	networks. These are not	Hearsay. FRE 802 et seq.	
25	behaviors of someone that does	Vague and ambiguous.	
26	not know the Internet. However,	Inadmissible opinion	
27	Taitz definitely wants to project	testimony. FRE 701 et seq.	
28	that she doesn’t know computers.	Assumes facts not in	

1	She needs that image to make	evidence. Argumentative.	
2	others believe her sites were and		
3	are constantly hacked and monies		
4	stolen. Why is that?"		
5	Declaration of Lisa Ostella, ¶ 8.		
6	9. "In December 2008, Taitz,	Irrelevant. FRE 401, 402.	Sustained: _____
7	had me searching for a book on	Hearsay. FRE 802 et seq.	Overruled: _____
8	Vatel so she could reference the	Speculation. Lacks	
9	definition on Natural Born	foundation.	
10	Citizen. I found a book online		
11	and purchased it. I had		
12	inadvertently purchased a book		
13	in PDF format rather than a		
14	physical book. I downloaded the		
15	PDF format. The download		
16	format cost \$24.95. I used this		
17	downloaded format to send to		
18	people as a thank you for		
19	donating to Taitz's Defend Our		
20	Freedoms Foundations, Inc. I		
21	was able to see the donations		
22	coming in because my email was		
23	in the Defend Our Freedoms		
24	Foundation PayPal account as a		
25	customer service representative.		
26	So, as donations were made to		
27	Taitz, I sent a thank you letter		
28			

1	with a link to a free download of 2 the Vatel paper on Natural Born 3 Citizen. Taitz sent me a check 4 for \$25.00 to reimburse me for 5 this PDF format book. The 6 check was issued from her dental 7 practice and not from her 8 personal account.” Declaration of 9 Lisa Ostella, ¶ 9.		
10	10. “In January 2009, Taitz 11 wanted to utilize me further as a 12 legal assistant. I told her on 13 many occasions I had never 14 worked in law before. January to 15 February 2009, I was tasked with 16 creating subpoenas.” Declaration 17 of Lisa Ostella, ¶ 10.	Irrelevant. FRE 401, 402. Speculation. Lacks foundation. Hearsay. FRE 802 et seq.	Sustained: _____ Overruled: _____
18	11. “February 2009, Taitz 19 wanted me to write legal briefs 20 for her Military and Politician 21 Case. I told her again I did not 22 have legal experience and I had 23 never seen a brief before. Taitz 24 asked me if I had a Lexis account 25 to find briefs and copy them. I 26 had never heard of Lexis at this 27 point and did not know what she 28 was talking about. Taitz brought	Irrelevant. FRE 401, 402. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Speculation. Lacks foundation.	Sustained: _____ Overruled: _____

1	in a volunteer that was a retired 2 paralegal to work with me in or 3 around February 18, 2009. I 4 worked with this former 5 paralegal for only a few weeks 6 (name and contact can be 7 furnished under seal.) I sent the 8 paralegal copies of everything 9 Taitz had sent me and she started 10 helping organize the material and 11 plaintiffs for the suit. The 12 paralegal had strongly suggested 13 breaking the cases out to a 14 Military and a separate 15 Representative suit rather than 16 having all the plaintiffs on one 17 suit. I assisted with organizing 18 the Plaintiffs.” Declaration of 19 Lisa Ostella, ¶ 11.		
20	12. “We never got around to writing the brief. The paralegal did not last that long as a volunteer. The first task the paralegal had me assist with was to contact Taitz’s clients to verify their consent to be Plaintiffs. We did not complete that task. The	Irrelevant. FRE 401, 402. Lacks foundation. Hearsay, multiple level hearsay. FRE 802 et seq. Speculation.	Sustained: _____ Overruled: _____

1	first few we had contacted had no		
2	idea they were Plaintiffs in a		
3	lawsuit. We brought that to		
4	Taitz's attention. Taitz yelled		
5	and screamed that we had no		
6	right contacting her clients.		
7	Taitz accused the paralegal of		
8	trying to steal her clients. Taitz		
9	-fired the paralegal and ordered		
10	me never to speak with the		
11	paralegal again. The Military		
12	and Representative Suits we were		
13	supposed to be working on were		
14	never written." Declaration of		
15	Lisa Ostella, ¶ 12.		
16	13. "The same above mentioned	Irrelevant. FRE 401, 402.	Sustained: _____
17	paralegal called me late on May	Hearsay, and multiple level	Overruled: _____
18	6 <sup>th</sup> , 2009. Apparently Taitz had	hearsay. FRE 802 et seq.	
19	listened to an interview Phil Berg	Vague and ambiguous.	
20	had on Patriots Heart Network	Argumentative.	
21	and was seeing plaid. The	Speculation. Lacks	
22	paralegal was extremely	foundation.	
23	concerned and strongly		
24	encouraged me to take my kids		
25	out of school and move		
26	immediately. The paralegal told		
27	me to stay aware of where my		
28			

1	dogs were at all times, if they		
2	went silent, to call the police fast.		
3	She told me to make		
4	arrangements with my husband		
5	to call and check on me often and		
6	if I didn't answer the phone, to		
7	call the police fast. She said Orly		
8	Taitz threatened that		
9	professionals were going to be		
10	used to "get my kids."		
11	Declaration of Lisa Ostella, ¶ 13.		
12	14. "I reported this to the North	Irrelevant. FRE 401, 402.	Sustained: _____
13	Brunswick Police. My contact	Speculation. Lacks	Overruled: _____
14	was Detective Cano. The threats	foundation. Hearsay. FRE	
15	started to increase. Payment	802 et seq. Vague and	
16	requests had been submitted to	ambiguous. No showing of	
17	Prly Taitz's, Defend Our	personal knowledge of	
18	Freedoms Foundation PayPal	declarant. FRE 602. Lack of	
19	account for a total sum of	authentication and	
20	\$25,000 in three consecutive	identification of exhibit.	
21	increments under the \$10,000	FRE 901 et seq.	
22	reporting laws on two separate		
23	occasions; see Ruben Nieto		
24	payment requests, Exhibits "138"		
25	and "139" filed on may 20, 2011,		
26	docket numbers 190-24 and 190-		
27	25. I ran a social networking		
28			

1	search in Spokeo.com using the 2 email Ruben Neito used in the 3 PayPal payment request and 4 learned he resided in 5 Albuquerque, New Mexico, close 6 to Lisa Liberi's home. It was 7 also discovered in the New 8 Mexico Judiciary that Nieto had 9 been convicted of serious violent 10 type offenses. I heared this man 11 was hired by Taitz to harm me, 12 Lisa Liberi, and our families as 13 had been threatened by Orly 14 Taitz." Declaration of Lisa 15 Ostella, ¶ 14.		
16	15. "I was provided a Court date 17 in North Brunswick to appear 18 regarding the criminal threats 19 made by Taitz. The Court sent a 20 subpoena to Orly Taitz to appear 21 for criminal court to establish 22 whether there was sufficient 23 cause to charge her criminally. 24 Taitz never appeared. The Judge 25 handling this procedure stated he 26 had spoken with the Federal 27 Bureau of Investigations (FBI);	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. Hearsay, and multiple level hearsay. FRE 802 et seq. No showing of personal knowledge of declarant. FRE 602. Argumentative.	Sustained: _____ Overruled: _____

1	and he had to close the		
2	proceedings. I was scared to		
3	death that Orly Taitz was going		
4	to harm me, my children and		
5	husband." Declaration of Lisa		
6	Ostella, ¶ 15.		
7	16. "August 7, 2009, we had our	Irrelevant. FRE 401, 402.	Sustained: _____
8	TRO hearing before Judge	Hearsay, and multiple level	Overruled: _____
9	Robreno in Pennsylvania. I	hearsay. FRE 802 et seq.	
10	testified to the criminal report I	Lack of authentication and	
11	had filed; the threats by Orly	identification of exhibit.	
12	Taitz to have my children	FRE 901 et seq.	
13	professionally kidnapped and my		
14	fear, see the August 7, 2009		
15	Transcript, docket number 141,		
16	pages 68 through 80, my		
17	testimony regarding Orly Taitz's		
18	threat to have my children		
19	professionally kidnapped and the		
20	Police report are located on page		
21	71, lines 22-25; page 72, lines 4-		
22	7; the balance of my testimony		
23	through page 80 of this transcript		
24	relates to the threats being posted		
25	on the Internet about me, my		
26	family and Plaintiff, Lisa Liberi."		
27	Declaration of Lisa Ostella, ¶ 16.		
28			

1	17. "Judge Robreno denied our	Irrelevant. FRE 401, 402.	Sustained: _____
2	TRO, I was horrified and scared	Hearsay. FRE 802 et seq.	Overruled: _____
3	to death for my children's lives		
4	and the life of me and my		
5	husband." Declaration of Lisa		
6	Ostella, ¶ 17.		
7	18. "Taitz had put out multiple	Irrelevant. FRE 401, 402.	Sustained: _____
8	messages containing various	Hearsay, and multiple level	Overruled: _____
9	threats against us and they were	hearsay. FRE 802 et seq.	
10	increasing. A GlueText search	Speculation. Lacks	
11	query done on 7/23/11 shows a	foundation. No showing of	
12	total of 743 articles in current	personal knowledge of	
13	circulation on the Internet, cite:	declarant. FRE 602. Vague	
14	<a href="http://www.gluetext.com/content/l/lisa_ostella.html">http://www.gluetext.com/content/l/lisa_ostella.html</a>	and ambiguous. Assumes	
15	GlueText	facts in evidence and no	
16	search scripts only return live	foundation regarding	
17	links and includes the publishing	"GlueText." Inadmissible	
18	source as well as last date	opinion testimony. FRE	
19	published. Most of these articles	701 et seq. Argumentative.	
20	and posts were published by		
21	Taitz through her developer's		
22	applications as per the provided		
23	source in the GlueText search		
24	query. That is further proof that		
25	she is not naive when it comes to		
26	computers and the Internet. 95%		
27	of these returns show		
28			

1	articles, posts with Taitz's false		
2	claims of my criminal activity		
3	and criminal record. Taitz		
4	continues to post about us and		
5	this case even after Judge		
6	Guilford sanctioned her, 7/22/11.		
7	No average persocontact would		
8	know or believe that the		
9	accusations are not true. Average		
10	people are not in contact with the		
11	service providers like we have		
12	been. The service providers that		
13	host these sites tell us we cannot		
14	have these stories removed		
15	without a court order as per their		
16	standard policy." Declaration of		
17	Lisa Ostella, ¶ 18.		
18	19. Taitz had contact directly	Irrelevant. FRE 401, 402.	Sustained: <u>      </u>
19	and indirectly with my neighbors,	Speculation. Lacks	Overruled: <u>      </u>
20	people in my town, my county	foundation. No showing of	
21	and two other counties I worked	personal knowledge of	
22	in when we lived in North	declarant. FRE 602.	
23	Brunswick. She sent her posts	Hearsay, and multiple level	
24	with false assertions and	hearsay. FRE 802 et seq.	
25	accusations to them through the	Vague and ambiguous.	
26	email, through links and third	Inadmissible opinion	
27	person outreach. Taitz, with her	testimony. FRE 701 et seq.	
28			

1	associates reached out to every	Assumes facts not in	
2	customer I had as Go Excel	evidence, and no	
3	Global, associates of mine in	foundation, regarding	
4	town, county and the Chamber of	alleged “posts” and	
5	Commerce’s my business	“emails.” Argumentative.	
6	belonged to and told them I had a		
7	felony record and I was stealing		
8	from her Nonprofit Foundation.		
9	Taitz and her associates reported		
10	me and my business, Go Excel		
11	Global to the North Brunswick		
12	Police, the New Jersey FBI, New		
13	Jersey State Consumer Affairs,		
14	North Brunswick Republican		
15	Organization, Middlesex County		
16	Republican Organization;		
17	individual customers found listed		
18	with my domain name and		
19	politicians I had worked for.		
20	Search engines run on my name		
21	brings up endless listings of		
22	‘Crimes by Lisa Ostella’. She		
23	did this as an attorney with the		
24	backing of a Private Investigator		
25	with Scotland Yard credentials		
26	and did this through a person that		
27	works as a Minister and Author.		
28			

1	And no one shut her down. So		
2	no one knew what to believe."		
3	Declaration of Lisa Ostella, ¶ 19.		
4	20. "We moved to get away	Irrelevant. FRE 401, 402.	Sustained: _____
5	from the fear and humiliation	Lacks foundation.	Overruled: _____
6	caused by Taitz. Since these	Speculation. No showing of	
7	stories and posts continue to be	personal knowledge of	
8	published and republished, my	declarant. FRE 602. Vague	
9	new neighbors and people my	and ambiguous.	
10	family and I are involved with	Inadmissible opinion	
11	such as school, club activities,	testimony. FRE 701 et seq.	
12	and my husband's work	Hearsay, and multiple level	
13	colleagues and students are now	hearsay. FRE 802 et seq.	
14	seeing these posts and articles.	Argumentative.	
15	People are trying to tip toe		
16	around the information politely;		
17	but, they are wondering if I am a		
18	criminal and are making		
19	decisions based on this		
20	confusion. I will never be able to		
21	undo these perceptions. My		
22	children an husband, who is		
23	professionally credentialed, has		
24	become victims of these		
25	perceptions too. Declaration of		
26	Lisa Ostella, ¶ 20.		
27	21. "During the same time Taitz	Irrelevant. FRE 401, 402.	Sustained: _____
28	was posting my personal	Speculation. Lacks	Overruled: _____

1	information, such as: name, 2 address, phone number, maiden 3 name, and names of my family 4 members, my social security 5 number and personal information 6 on the Internet and showed up in 7 the slavehack.com database see 8 Plaintiffs First Amended 9 Complaint on page 56, paragraph 10 133. Slavehack.com is an online 11 game for hackers. Slavehack is 12 for training hackers to crack 13 computers, servers and banks as 14 well as live time attacks. 15 Attached as EXHIBIT "1" is a 16 partial member list. This list 17 alone includes some very well 18 known hacker groups including 19 4Chan, a known anonymous 20 "hacking" group." Declaration 21 of Lisa Ostella, ¶ 21.	foundation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Inadmissible opinion testimony. FRE 701 et seq. Lack of authentication and identification of exhibit. FRE 901 et seq. Argumentative.	
22	22. "January 2011. My private 23 information was available to all 24 these hacker groups 25 internationally. After Taitz 26 started distributing our private 27 information through the Internet	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level	Sustained: _____ Overruled: _____

28

1	and other third parties, Lexis	hearsay. FRE 802 et seq.	
2	searches on Liberi and myself	Vague and ambiguous.	
3	started showing our social	Inadmissible opinion	
4	securities numbers as being used	testimony. FRE 701 et seq.	
5	by multiple people. I never	Argumentative.	
6	expected Taitz or anyone else to		
7	have access to any of my private		
8	data." Declaration of Lisa		
9	Ostella, ¶ 22.		
10	23. "I had learned from North	Irrelevant. FRE 401, 402.	Sustained: _____
11	Brunswick's Detective Cano we	Lacks foundation.	Overruled: _____
12	had jurisdictional issues when it	Speculation. No showing of	
13	came to Internet crimes with	personal knowledge of	
14	different laws in different states.	declarant. FRE 602.	
15	Judge Robreno in our civil case	Hearsay, and multiple level	
16	didn't give us a tool Detective	hearsay. FRE 802 et seq.	
17	Cano said we needed, the TRO,	Vague and ambiguous.	
18	and Orly Taitz had escalated her	Inadmissible opinion	
19	threats against me, my family,	testimony. FRE 701 et seq.	
20	and the other Plaintiffs in our	Argumentative.	
21	case. I felt powerless; I was		
22	scared for my safety and that of		
23	my family." Declaration of Lisa		
24	Ostella, ¶ 23.		
25	24. "I had to get my family out	Irrelevant. FRE 401, 402.	Sustained: _____
26	of our North Brunswick home for	Lacks foundation.	Overruled: _____
27	their safety. Now we are in	Speculation. No showing of	
28	danger in our new town."	personal knowledge of	

1	Declaration of Lisa Ostella, ¶ 24.	declarant. FRE 601. Hearsay. FRE 802 et seq. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	
2	25. "We were going to move to keep my children in the same private diocese school system. But Taitz's threatening and dangerous actions radically changed that. I couldn't bring strangers in to see the house if we were to list it any multiple listing service, MLS. I wouldn't know if they were Taitz followers and staking out my house since Taitz also works in real estate and has access to that service. I called investors, had my mortgage bought out within two weeks, and physically moved my family in to my husband's uncle's house. I had that house in North Brunswick packed up and moved in three weeks by myself due to my husband's work schedule. I honestly didn't	Irrelevant. FRE 401, 402. Assumes facts not in evidence, and no foundation, regarding alleged "threats" and other acts. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Lack of authentication and identification of exhibit. FRE 901 et seq. Vague and ambiguous. Argumentative.	Sustained: _____ Overruled: _____

1	know, since Taitz had real estate		
2	connections (see		
3	TaitzOfficeSuites.com) if she		
4	would have contacts with any		
5	professional movers. I wasn't		
6	risking it. What I couldn't move,		
7	I left. We resided in my		
8	husband's uncle's house without		
9	an approved mortgage for		
10	months trying to hide for our		
11	safety from Orly Taitz, her		
12	followers and supporters."		
13	Declaration of Lisa Ostella, ¶ 25.		
14	26. "While all this was going on,	Irrelevant. FRE 401, 402.	Sustained: _____
15	a woman called me on my cell	Lacks foundation.	Overruled: _____
16	phone claiming to be my	Speculation. Hearsay, and	
17	'biological Aunt'. She said she	multiple level hearsay. FRE	
18	had seen a post on some	802 et seq. No showing of	
19	unnamed message forum	personal knowledge of	
20	claiming to be from me, looking	declarant. FRE 602.	
21	for my biological mother and that	Inadmissible opinion	
22	I had my cell phone posted for	testimony. FRE 701 et seq.	
23	contact. I never made any such	Vague and ambiguous.	
24	post. I especially wouldn't post	Argumentative.	
25	on an message on a forum		
26	looking for information about my		
27	biological family and leave my		
28			

1	personal contact information. I		
2	knew very well the Internet is the		
3	Wild West for insanity. This		
4	woman, calling herself 'LeeAnn'		
5	said my biological mother was		
6	looking to get in touch with me		
7	and her name is 'Jane' and lives		
8	in California. I told her this		
9	'Jane' could send me an email		
10	and I didn't want 'LeeAnn' or		
11	"Jane" to call me. I had no idea		
12	where this was coming from and		
13	I didn't want to go down this		
14	rabbit hole. Declaration of Lisa		
15	Ostella, ¶ 26.		
16	27. "During this time, I found a	Irrelevant. FRE 401, 402.	Sustained: _____
17	MySpace page while running	Lacks foundation. Lack of	Overruled: _____
18	Orly Taitz's Yahoo email in	identification of documents	
19	Spokeo.com (a social networking	referred to. FRE 901 et seq.	
20	search engine). Spokeo pulled a	Hearsay, and multiple level	
21	MySpace page made with Taitz's	hearsay. FRE 802 et seq.	
22	Yahoo email where she called	No showing of personal	
23	herself 'Jane'. She listed her age	knowledge of declarant.	
24	as 18 and had MySpace friends	FRE 602. Vague and	
25	that looked like a bunch of young	ambiguous. Argumentative.	
26	girls." Declaration of Lisa		
27	Ostella, ¶ 27.		
28			

1	28. "Also, during this time period, Orly Taitz posted that my attorney's assistant, Lisa Liberi, was born in Washington State, her father's name and her mother's maiden name. We called the records office in Washington State to learn what information was needed to obtain a copy of a birth certificate. Washington State just needed the same primary identification information that Taitz had sent out all over the Internet. We both wondered if this is how Taitz learned I was adopted, if my 'Jane' was also Taitz or an associate of hers." Declaration of Lisa Ostella, ¶ 28.	Irrelevant. FRE 401, 402. Hearsay, and multiple level hearsay. FRE 802 et seq. Assumes facts in evidence and no foundation regarding alleged "post." Lacks foundation. Speculation. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: _____ Overruled: _____
20	29. "The day we began residing at my husband's uncle's house, I received an email from 'Jane'. She said she was watching our moving day on Google Satellite. Normal Google Satellite doesn't allow for live time viewing. However, Orly Taitz's husband's	Irrelevant. FRE 401, 402. Hearsay, and multiple level hearsay. FRE 802 et seq. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Lack of identification of	Sustained: _____ Overruled: _____

1	company, Daylight, is a U.S.	documents referred to. FRE	
2	Department of Defense	901 et seq. Argumentative.	
3	Contractor. I have no idea what		
4	access they have to live satellite		
5	feeds. Now I didn't know what		
6	to think or what to do. I made		
7	this move, fast and as quietly as		
8	possible in order to protect my		
9	family." Declaration of Lisa		
10	Ostella, ¶ 29.		
11	30. "When we filed suit, my	Irrelevant. FRE 401, 402.	Sustained: _____
12	attorney recommended that I use	Hearsay, and multiple level	Overruled: _____
13	a P.O. Box number to mask my	hearsay. FRE 802 et seq.	
14	personal account information. I	Vague and ambiguous.	
15	obtained a post office box in the	Assumes facts not in	
16	town I moved out of, North	evidence, and no	
17	Brunswick, to help mask my	foundation regarding	
18	move. That didn't fool Orly	alleged "posts."	
19	Taitz. Taitz posted all over her	Argumentative.	
20	blog that the P.O. Box was only		
21	sued as my business address. So		
22	that didn't work." Declaration of		
23	Lisa Ostella, ¶ 30.		
24	31. "Months later, our mortgage	Irrelevant. FRE 401, 402.	Sustained: _____
25	came through and now we had to	Vague and ambiguous.	Overruled: _____
26	make my husband's uncle's	Lacks foundation.	
27	house our legal address. I put as	Speculation. No showing of	
28	much of the utility and contact	personal knowledge of	

1	information under our P.O. Box	declarant. FRE 602.	
2	as I could; New Jersey has	Inadmissible opinion	
3	stricter laws than most states in	testimony. FRE 701 et seq.	
4	using P.O. Boxes as contact	Assumes facts not in	
5	information. A few days after	evidence and no foundation	
6	the deed was filed in the state	regarding alleged "cache."	
7	records, I ran our information in	Argumentative.	
8	search engines. The deed record		
9	came up cached in a Google		
10	search page. That record		
11	information is entered in a		
12	database. The record was cached		
13	in a html page. In order for that		
14	to happen that record would have		
15	had to been pulled several times		
16	for Google to cache it as an html		
17	(web page) page. That means		
18	someone ran our information		
19	several times and pulled that		
20	information to make it display as		
21	a webpage in order to get it		
22	cached in a Google search		
23	engine." Declaration of Lisa		
24	Ostella, ¶ 31.		
25	32. "Nine days after this record	Irrelevant. FRE 401, 402.	Sustained: _____
26	was publicly accessible, my	Lacks foundation.	Overruled: _____
27	children's rabbits were gutted.	Speculation. Hearsay. FRE	
28			

1	The carcasses were nowhere to	802 et seq. No showing of	
2	be found; but the inerts were	personal knowledge of	
3	intact and laid out at the foot our	declarant. FRE 602. Vague	
4	our deck right where one would	and ambiguous.	
5	step off our deck. Animal	Inadmissible opinion	
6	Control set up a motion camera	testimony. FRE 701 et seq.	
7	in my yard right where their	Argumentative.	
8	coops were kept. If it was an		
9	animal that did this, they would		
10	be back to the same spot within a		
11	few days if we left the smells		
12	(hay and bedding) there. That		
13	camera was up for two weeks.		
14	No animal came into our yard		
15	and approached the coops		
16	looking for the rabbits. Wild		
17	animals will tear apart their		
18	meals and or carry them off and		
19	bury them. Not lay out and		
20	display the inerts. We reside in a		
21	private upper class community.		
22	The neighborhood and area we		
23	reside has a very low crime rate.		
24	Most of the people here didn't		
25	even know we had rabbits; we		
26	were still too new to the		
27			
28			

1	neighborhood.” Declaration of		
2	Lisa Ostella,¶ 32.		
3	33. “Now I learned I had a new	Irrelevant. FRE 401, 402.	Sustained: _____
4	problem. Our move changed our	Lacks foundation.	Overruled: _____
5	jurisdiction. Even though I had	Speculation. Vague and	
6	my reports I had made with	ambiguous. Hearsay. FRE	
7	North Brunswick transferred, my	802 et seq. No showing of	
8	new town can’t prosecute	personal knowledge of	
9	anything that happened in North	declarant. FRE 602.	
10	Brunswick. Yes, the events were	Argumentative.	
11	on record, but we had to start all		
12	over again.” Declaration of Lisa		
13	Ostella,¶ 33.		
14	34. “Shortly after my rabbits	Irrelevant. FRE 401, 402.	Sustained: _____
15	were killed, I agreed to lend	Hearsay, and multiple level	Overruled: _____
16	testimony to Charles Lincoln,	hearsay. FRE 802 et seq.	
17	referred to as Lincoln from here	Lacks foundation.	
18	on, in a case he was being falsely	Speculation. Vague and	
19	accused of crimes by Orly Taitz,	ambiguous. No showing of	
20	<u>U.S. Bank v. Riverneider</u> , U.S.	personal knowledge of	
21	District Court, Southern District	declarant. FRE 602.	
22	of Florida, Case No. 9:09-cv-	Argumentative.	
23	81255-WPD. I had learned from		
24	my attorney, who was		
25	representing Lincoln that he had		
26	information from me and would		
27	provide me with an affidavit.”		
28	Declaration of Lisa Ostella,¶ 34.		

1	35. "It turned out that Lincoln 2 drove Orly Taitz around New 3 Jersey after a hearing in our case 4 in Pennsylvania. The areas they 5 drove around were that of my 6 children's school and where we 7 resided." Declaration of Lisa 8 Ostella, ¶ 35.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Argumentative.	Sustained: _____ Overruled: _____
9	36. "The testimony Lincoln had 10 needed from me for his 11 <u>Riverneider</u> Case was in regards 12 to when I was her assistant. Orly 13 Taitz had me sign documents for 14 her, which was pertinent to his 15 case, as Orly Taitz was falsely 16 accusing Lincoln of forging her 17 name. Lincoln had become Taitz 18 assistant after I had kicked her 19 off of y website. I was shocked , 20 horrified and scared when I saw 21 Lincoln's affidavit. During the 22 time when I had received 23 information that Orly Taitz was 24 going to have my children 25 professionally kidnapped, she 26 had come here to New Jersey. 27 Lincoln had driven her to eh	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Assumes facts not in evidence and lacks foundation, regarding alleged "accus[ations]" and threats and other acts. Argumentative.	Sustained: _____ Overruled: _____

1	locations she (Taitz) had		
2	instructed. He drove her past my		
3	children's school, my home, and		
4	to the North Brunswick Police		
5	Department. I know this because		
6	of the roads Lincoln stated he		
7	was on and the paths taken.		
8	Declaration of Lisa Ostella, ¶ 36.		
9	37. A few months after I	Irrelevant. FRE 401, 402.	Sustained: _____
10	received Lincoln's affidavit, I	Lacks foundation.	Overruled: _____
11	was running my children's	Speculation. No showing of	
12	emails in Spokeo.com and for the	personal knowledge of	
13	first time a picture of my	declarant. FRE 602.	
14	daughter came up. An account	Hearsay, and multiple level	
15	was opened for y daughter at	hearsay. FRE 802 et seq.	
16	Slide.com with her Yahoo email.	Vague and ambiguous.	
17	A picture (blurred) of her was	Inadmissible opinion	
18	there, standing outside her school	testimony. FRE 701 et seq.	
19	waiting for me to pick her up.	Argumentative.	
20	That picture would have been		
21	taken during the time Orly Taitz		
22	and Lincoln drove by because of		
23	my daughter's hairstyle. My		
24	daughter always had long hair		
25	and had it cut the first time in		
26	her life late May 2009 (Taitz and		
27	Lincoln were driving around my		
28			

1	children's school and our		
2	residence on or about June 25,		
3	2009). The picture was uploaded		
4	to the Slide.com account as a		
5	slide show; but this was the only		
6	picture left on the account so I		
7	couldn't see what other pictures		
8	were used to create the slide		
9	show. Declaration of Lisa		
10	Ostella, ¶ 37.		
11	38. "Between my Attorney's	Irrelevant. FRE 401, 402.	Sustained: _____
12	office and the Denville Police, I	Lacks foundation.	Overruled: _____
13	finally got the account down and	Speculation. No showing of	
14	closed. I gave the Denville	personal knowledge of	
15	police the affidavit of Charles	declarant. FRE 602.	
16	Lincoln about Orly Taitz and	Hearsay, and multiple level	
17	their drive by. But again,	hearsay. FRE 802 et seq.	
18	jurisdictional issues became a	Vague and ambiguous.	
19	problem. The drive by occurred	Inadmissible opinion	
20	in North Brunswick. They made	testimony. FRE 701 et seq.	
21	a contact with the FBI and started	Argumentative.	
22	forwarding all the information.		
23	The Denville Police said if our		
24	Judge would issue a TRO, it		
25	would give them more tools to		
26	work with. I took steps after this		
27	to make a few changes in my		
28			

1	children's appearance.		
2	Thankfully, many of these		
3	officers I was working with are		
4	also the resource officers at their		
5	schools. I did not know what		
6	else to do." Declaration of Lisa		
7	Ostella,¶ 38.		
8	39. "Orly Taitz of course,	Irrelevant. FRE 401, 402.	Sustained: _____
9	during all of these times,	Lacks foundation.	Overruled: _____
10	continued to issue lies and	Speculation. No showing of	
11	threats about us online. She	personal knowledge of	
12	continues to create sites and	declarant. FRE 602.	
13	reissue old as well as	Hearsay, and multiple level	
14	new posts with false accusations	hearsay. FRE 802 et seq.	
15	about me and my 'crimes' and	Vague and ambiguous.	
16	false accusations about Lisa	Inadmissible opinion	
17	Liberi and Mr. Berg."	testimony. FRE 701 et seq.	
18	Declaration of Lisa Ostella,¶ 39.	Assumes facts not in	
19		evidence and lacks	
20		foundation, regarding	
21		alleged "lies and threats"	
22		and other acts.	
23		Argumentative.	
24	40. "My daughter's birthday was	Irrelevant. FRE 401, 402.	Sustained: _____
25	coing up and we were planning	Lacks foundation.	Overruled: _____
26	the event. I started receiving	Speculation. No showing of	
27	posts that were awaiting	personal knowledge of	
28	moderation in the DefendOur	declarant. FRE 602.	

1 Freedoms blog. The Ips were Hearsay, and multiple level  
2 coming from a server out of the hearsay. FRE 802 et seq.  
3 Russian Federation. They were Vague and ambiguous.  
4 comments about my daughter's Inadmissible opinion  
5 birthday and to buy online drugs testimony. FRE 701 et seq.  
6 from them for a present. Why Lack of identification of  
7 would anyone posting from a documents referred to. FRE  
8 Russian Federation Server know 901 et seq. Argumentative.  
9 I had a daughter, let alone that  
10 her birthday was coming up??!!  
11 A few weeks after this post, I  
12 received a card in the mail from  
13 this woman from California,  
14 'Jane' saying she was going to be  
15 in my state during the weekend  
16 of my daughter's birthday and  
17 she wanted to come by and see  
18 my daughter. 'Jane' claimed she  
19 had just moved and her old  
20 contact information would no  
21 longer work. So now this woman  
22 claims she was going to be here.  
23 This scared me so much that I  
24 hired a police officer to guard my  
25 daughter's party and protect my  
26 family. It must have worked  
27 because two days after the party,

28

1	some random unnamed person on 2 one of the forums that follows 3 every breathe that Orly Taitz 4 takes, posted an out of the 5 ordinary story about his daughter 6 having a birthday (at a zoo) and 7 there were police all around. I 8 am glad I took measure to have 9 the police there.” Declaration of 10 Lisa Ostella, ¶ 40.		
11	41. “As demonstrated by the 12 Exhibits on file with this Court, 13 see Exhibits “1” through “145” 14 filed May 20, 2011, docket 15 number 190 through 190-27, all 16 of Orly Taitz’s emails, with the 17 false and damaging information 18 she sent regarding me and Lisa 19 Liberi, were signed DDS as well 20 as Esq. with the addresses and 21 contact information to her dental 22 offices: Orly Taitz DDS Esq, 23 26302 La Paz ste 211, Mission 24 Viejo Ca 92691. 29839 S. 25 Margarita Pkwy, Rancho Santa 26 Margarita Ca 92688. Ph. W-949- 27 586-8110. C-949-683-5411. Fax	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Lack of identification and authentication of documents referred to. FRE 901 et seq. Argumentative.	Sustained: _____ Overruled: _____

1 949-586-2082. Anyone that  
2 didn't want to use PayPal were to  
3 mail checks of donations to her  
4 dental office. DOFF is listed  
5 witha business address to her  
6 dentail office. A whois on  
7 OrlyTaitzEsq.com that Taitz uses  
8 for DOFF is: Registrant: Orly  
9 Taitz Esquire, 26302 Lapaz Suite  
10 211 Mission Viejo, CA 92691  
11 US. Domain name:  
12 ORLYTAITZESQ.COM.  
13 Administrative Contact,  
14 Technical Contact: Orly Taitz  
15 Esquire  
16 <http://www.domaintools.com/reverse-whois/?email=b4881eb33c430f573f2d563f76ea54fa&&&&&&&&&&>  
17 &&&&<http://www.domaintools.com/research/reverse-whois/?email=b4881eb33c430f573f2d563f76ea54fa>. 26302  
18 Lapaz Suite 211 Mission Viejo,  
19 CA 92691 US. 949-683-5411.  
20 Record expires on 17-Apr-2015.  
21 Record created on 17-Apr-

1	2009.” Declaration of Lisa		
2	Ostella,¶ 41.		
3	42. “Orly Taitz has her Defend	Irrelevant. FRE 401, 402.	Sustained: _____
4	Our Freedoms Foundations, Inc.	Lacks foundation.	Overruled: _____
5	blog registered to her dental	Speculation. No showing of	
6	office as well as using her dental	personal knowledge of	
7	office to receive communications	declarant. FRE 602.	
8	regarding her posts on her blog	Hearsay. FRE 802 et seq.	
9	and monies.” Declaration of Lisa	Vague and ambiguous.	
10	Ostella,¶ 42.	Inadmissible opinion	
11		testimony. FRE 701 et seq.	
12		Argumentative.	
13	43. “I live in fear every day for	Irrelevant. FRE 401, 402.	Sustained: _____
14	myself, my children and husband.	Lacks foundation.	Overruled: _____
15	Because of the continued	Speculation. No showing of	
16	threatening, harassing and	personal knowledge of	
17	damaging actions of Orly Taitz.	declarant. FRE 602.	
18	Due to the acts of Orly Taitz I	Hearsay. FRE 802 et seq.	
19	have suffered and continue	Vague and ambiguous.	
20	suffering from severe, substantial	Inadmissible opinion	
21	emotional distress.” Declaration	testimony. FRE 701 et seq.	
22	of Lisa Ostella,¶ 43.	Assumes facts not in	
23		evidence and lacks	
24		foundation, regarding	
25		alleged “actions” and	
26		“acts.” Argumentative.	

27     ///

28     ///

1                   **C.    *Objections to Declaration of Charles Edward Lincoln, III***

2                   **EVIDENTIARY OBJECTIONS**

3 <b>DECLARATION OF</b>	4 <b>MOVING</b>	5 <b>COURT'S</b>
6 <b>PLAINTIFF, LISA LIBERI</b>	7 <b>DEFENDANT'S</b>	8 <b>RULING</b>
9 <b>OBJECTIONS</b>	10	11
12                   1.“I began working for and with 13                   Orly Taitz [“Orly”] in or about 14                   late May/Early June 2009. 15                   Although I was hired initially for 16                   simple legal research and 17                   drafting, in effect as Orly’s Law 18                   Clerk & Personal Assistant, our 19                   relationship rapidly became 20                   much more complex, and in 21                   effect we became partners, or at 22                   least tried to implement a 23                   partnership or partnerships of 24                   several characters, of both the 25                   business and personal variety.” 26                   Declaration of Charles Edward 27                   Lincoln, ¶ 1.	27                   Irrelevant. FRE 401, 402. 28                   Lacks foundation. 29                   Speculation. No showing of 30                   personal knowledge of 31                   declarant. FRE 602. 32                   Hearsay. FRE 802 et seq. 33                   Vague and ambiguous. 34                   Inadmissible opinion 35                   testimony. FRE 701 et seq. 36                   Argumentative.	37                   Sustained: _____ 38                   Overruled: _____
39                   2. ‘I received my Ph.D. degree 40                   in 1990 from the Graduate 41                   School of Arts & Sciences at 42                   Harvard University, Cambridge, 43                   Massachusetts 02138, my 44                   dissertation’s short title being 45                   “Ethnicity and Social	46                   Irrelevant. FRE 401, 402. 47                   Lacks foundation. 48                   Speculation. No showing of 49                   personal knowledge of 50                   declarant. FRE 602. 51                   Hearsay. FRE 802 et seq. 52                   Vague and ambiguous.	53                   Sustained: _____ 54                   Overruled: _____

1	Organization" and I also received	Inadmissible opinion	
2	a Juris Doctor ("J.D.") from the	testimony. FRE 701 et seq.	
3	Law School of the University of	Argumentative.	
4	Chicago in 1992." Declaration of		
5	Charles Edward Lincoln, ¶ 2.		
6	3. "I served as judicial extern for	Irrelevant. FRE 401, 402.	Sustained: _____
7	the Honorable Stephen Reinhardt	Lacks foundation.	Overruled: _____
8	of the United States Court of	Speculation. No showing of	
9	Appeals for the Ninth Circuit in	personal knowledge of	
10	1987-88 and as a judicial law	declarant. FRE 602.	
11	clerk for the Honorable Kenneth	Hearsay. FRE 802 et seq.	
12	L. Ryskamp of the United States	Vague and ambiguous.	
13	District Court for the Southern	Inadmissible opinion	
14	District of Florida where I was	testimony. FRE 701 et seq.	
15	hired in 1991 and completed my	Argumentative.	
16	term in September 1993."		
17	Declaration of Charles Edward		
18	Lincoln, ¶ 3.		
19	4. "I passed the Bar Exams in	Irrelevant. FRE 401, 402.	Sustained: _____
20	California, Florida, and Texas in	Lacks foundation.	Overruled: _____
21	1992-1994, maintained offices in	Speculation. No showing of	
22	the States of Durango and	personal knowledge of	
23	Yucatan in Mexico as well as in	declarant. FRE 602.	
24	Louisiana and Texas, until 2000	Hearsay, and multiple level	
25	when I resigned in Texas as a	hearsay. FRE 802 et seq.	
26	result of an indictment in Texas,	Vague and ambiguous.	
27	as a "plea bargain" condition of	Inadmissible opinion	
28	having 4/5 charges dropped and	testimony. FRE 701 et seq.	

1	serving neither a single day of 2 incarceration nor paying any 3 significant fine or having any 4 substantial restrictions on my 5 liberty during a three year period 6 of probation, during which I was 7 allowed to travel internationally 8 to Europe and Africa, and even 9 to maintain lawsuits and collect 10 settlements on my own. I 11 remained licensed and active in 12 California and Florida until 13 2002-2003, when those states 14 imposed “reciprocal discipline” 15 on me—requiring disbarment as 16 the equivalent of “resignation in 17 lieu” effected by the plea bargain 18 in Texas.” Declaration of Charles 19 Edward Lincoln, ¶ 4.	Argumentative.	
20	5. “Orly Taitz and I met and 21 started working through a mutual 22 friend, Dr. Kathy Ann Garcia- 23 Lawson, at a time (end of May 24 2009) when Orly was seeking 25 legal assistance with her 26 litigation, including this present 27 case (Lisa Liberi, Lisa Ostella,	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion	Sustained: _____ Overruled: _____

1	and Philip J. Berg) against her 2 and Defend our Freedoms 3 Foundation (DoFF)." Declaration 4 of Charles Edward Lincoln, ¶ 5.	testimony. FRE 701 et seq. Argumentative.	
5	6. "Orly Taitz told me that she did not have any accounts, nor any other prior access, either personally or through her law office, at or around the time we met and throughout the five months we were working together with any of the LexisNexis defendants in this case, Reed-Elsevier, ChoicePoint, Inc. and/or Intelius, Inc. I had used LexisNexis and Intelius before, and had active subscriptions, but Orly had absolutely no online legal research tools at all, nor did she know how to use any of them."	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: _____ Overruled: _____
21	Declaration of Charles Edward Lincoln, ¶ 6.		
24	7. "I read with great interest Orly Taitz' Motion to Dismiss file in this case on behalf of her corporation, Defend our Freedoms Foundations, Inc.,	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602.	Sustained: _____ Overruled: _____

1	[DOFF"] in which Orly appears 2 to admit, carte blanche, to all of 3 plaintiffs' allegations in this case 4 against her (Orly), her 5 Corporations, her husband, his 6 Corporation, Daylight Chemical 7 Information Systems, Inc. 8 ("Daylight"), Oracle, all the 9 Lexis Defendants and Intelius, 10 Inc." Declaration of Charles 11 Edward Lincoln, ¶ 7.	Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	
12	8. "Even more interestingly, 13 Orly Taitz appears to admit 14 without qualification to having 15 obtained the information and the 16 publication thereof directly from 17 the LexisNexis defendants, 18 ChoicePoint, Inc. and Intelius, 19 Inc., (viz. Orly's Motion to 20 Dismiss file on behalf of DOFF, 21 Docket No. 283, filed July 11, 22 2011 at pages 17 through 19." 23 Declaration of Charles Edward 24 Lincoln, ¶ 8.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: _____ Overruled: _____
25	9. "I read Plaintiffs' original 26 complaint in this case, as I 27 worked against it for Orly while 28 the case was pending before	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of	Sustained: _____ Overruled: _____

1	Judge Robreno in the Eastern 2 District of Pennsylvania. Even 3 though Orly and I no longer work 4 together after she terminated both 5 our professional collaboration 6 and personal relationships, and 7 attacked me viciously on-line and 8 in the Courts I might add, 9 apparently to cover up some 10 embarrassment or shame she 11 might have felt regarding our 12 relationship, I am still following 13 this case and have read plaintiffs 14 First Amended Complaint 15 ["FAC"]. Declaration of Charles 16 Edward Lincoln, ¶ 9.	declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	
17	10. "Orly's apparently unlimited 18 admissions to obtaining 19 Plaintiffs', Lisa Liberi and Lisa 20 Ostella's private information 21 from LexisNexis, ChoicePoint, 22 Inc., and Intelius, Inc., in my 23 professional opinion, also 24 implicate and substantiate 25 plaintiffs' claims against 26 defendants, Orly's husband, 27 Yosef Taitz, Daylight Chemical	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: _____ Overruled: _____

1	Information Systems, and		
2	Oracle.” Declaration of Charles		
3	Edward Lincoln, ¶ 10.		
4	11. “As noted above, I knew at	Irrelevant. FRE 401, 402.	Sustained: _____
5	all relevant times between late	Lacks foundation.	Overruled: _____
6	May 2009 and November 2009	Speculation. No showing of	
7	from personal experience with	personal knowledge of	
8	Orly nationwide and at both her	declarant. FRE 602.	
9	offices in Orange County that,	Hearsay, and multiple level	
10	for a fact, Orly Taitz did not have	hearsay. FRE 802 et seq.	
11	accounts with the defendants	Vague and ambiguous.	
12	Lexis Nexis companies;	Inadmissible opinion	
13	ChoicePoint, Inc. or Intelius.	testimony. FRE 701 et seq.	
14	She told me repeatedly that she	Argumentative.	
15	did not have access to these		
16	services, and I gave her my		
17	LexisNexis identity and		
18	passcode—but my subscription		
19	was limited and did not contain		
20	access to any credit or personal		
21	finance information.”		
22	Declaration of Charles Edward		
23	Lincoln, ¶ 11.		
24	12. “The only way Orly could	Irrelevant. FRE 401, 402.	Sustained: _____
25	have obtained Plaintiffs	Lacks foundation.	Overruled: _____
26	information from the LexisNexis	Speculation. No showing of	
27	defendants and defendant	personal knowledge of	
28	Intelius, Inc., as she admits in	declarant. FRE 602.	

1	DOFF's Motion to Dismiss,	Hearsay, and multiple level	
2	would have been through her	hearsay. FRE 802 et seq.	
3	husband, Defendant Yosef Taitz,	Vague and ambiguous.	
4	and specifically through Yosef	Inadmissible opinion	
5	Taitz's company defendant	testimony. FRE 701 et seq.	
6	Daylight and defendant Oracle,	Argumentative.	
7	Inc. as outlined in the plaintiffs		
8	FAC. Orly told me repeatedly		
9	that she did in fact receive		
10	substantial information from her		
11	husband, as well as a great deal		
12	of money (including all the		
13	money "we" had to live and		
14	travel on...although I only		
15	learned that she effectively had		
16	no money of her own at the dead		
17	end of our relationship in late		
18	October/early November 2009)		
19	and that was why she was		
20	unwilling to leave him, although		
21	she described him as cold, cruel,		
22	both physically and emotionally		
23	abusive, and completely		
24	disinterested in her from a		
25	romantic and personal		
26	standpoint." Declaration of		
27	Charles Edward Lincoln, ¶ 12.		
28			

1	13. "Orly also admits in her Motion to Dismiss filed on behalf of DOFF that she also obtained information from Neil Sankey, a defendant in this case. Orly showed me and asked me to evaluate, and so I actually saw the background searches, submitted to Orly from Mr. Sankey." Declaration of Charles Edward Lincoln, ¶ 13.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: _____ Overruled: _____
12	14. "Orly explained to me and showed me in the documentation that Mr. Sankey obtained all this information from his son, Todd Sankey and his company, the Sankey Firm, Inc.'s accounts with the defendants LexisNexis, ChoicePoint, Inc. and Intelius. She regarded them as close and trusted allies, and she knew that I was unable, due to my subscription limitations, to provide equivalent information or recheck the accuracy of what she was provided by these sources (her Husband's and	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: _____ Overruled: _____

1	Sankey's corporations)." Declaration of Charles Edward Lincoln, ¶ 14.		
2	15. "As much as I cared about her and found her among the most fascinating and surely the most complex women I have ever known, it seemed extremely odd to me that Orly, who is a licensed attorney, engaged in some of the most complex and potentially politically and historically significant litigation I have known about, did not know how to conduct any type of research, including but not limited to online legal research for purposes of preparing any sort of argument or even the most rudimentary legal brief. It sometimes seemed as if Orly has never really been to Law School, really, and was hard to believe that she ever passed the California bar—which is reputed to be the most difficult in the United States (except for the unusual civil law of Louisiana)."	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: _____ Overruled: _____

1	Declaration of Charles Edward		
2	Lincoln, ¶ 15.		
3	16. "Orly continued asking her	Irrelevant. FRE 401, 402.	Sustained: _____
4	supporters and legal colleagues	Lacks foundation.	Overruled: _____
5	for help in research for her legal	Speculation. No showing of	
6	briefs, but (at least from what she	personal knowledge of	
7	told me, prior to and during the	declarant. FRE 602.	
8	time I worked with her) none of	Hearsay, and multiple level	
9	her supporters helped her out in	hearsay. FRE 802 et seq.	
10	this way. Although at the time I	Vague and ambiguous.	
11	believed that Orly showed more	Inadmissible opinion	
12	determination, grit, and courage	testimony. FRE 701 et seq.	
13	than any woman I had ever	Argumentative.	
14	known, it was almost as if she		
15	barely knew anything about the		
16	law or how to do any sort of		
17	research at all. She latched on to		
18	certain ideas and insisted on		
19	following through with them.		
20	She was particularly interested in		
21	all those ideas which would draw		
22	attention to her and elicit		
23	enthusiasm or support from her		
24	"followers"—although I told her		
25	that "legal research by political		
26	lay committee" was an extremely		
27	bad idea—even if the lay		
28			

1	committee was composed of 2 “patriots” who claimed to 3 understand the law better than 4 anyone else.” Declaration of 5 Charles Edward Lincoln, ¶ 16.		
6	17. “Again as noted above, I had 7 a Lexis account, which was 8 limited to basic state and federal 9 (and Canadian/Mexican) legal 10 research, case searches, 11 “Shepard’s© Citations,” law 12 reviews, some other secondary 13 sources, pleadings, motions and 14 briefs. I did not have the type of 15 account with Lexis that allowed 16 background searches, social 17 security numbers searches or any 18 type of private data. I did not 19 have a ChoicePoint, Inc. or 20 Seisint, Inc. account, but I did 21 have a limited access Intelius 22 Account for limited personal data 23 searches.” Declaration of Charles 24 Edward Lincoln, ¶ 17.	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	Sustained: _____ Overruled: _____
25	18. “In the time I worked with 26 Orly and was with her, and we 27 spent a great deal of time 28 together, both at her offices and	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of personal knowledge of	Sustained: _____ Overruled: _____

1	wherever I was staying (at my 2 former house in Rancho Santa 3 Margarita or at hotels) I do not 4 recall ever seeing Orly even 5 attempt to do research on her 6 own. She would often tell me 7 what her supporters had told her, 8 what her husband had provided 9 for her, or what Sankey or other 10 researchers (there were several 11 other whose names I do not 12 presently recall) had provided for 13 her. Nor, did Orly ever direct me 14 on what legal searches she 15 required for her legal briefs—I 16 was constantly telling her where 17 we should go, and she would 18 make the decision about how to 19 emphasize or highlight issues 20 depending on what I would 21 sometimes tease her by calling 22 their “commercial appeal.””” 23 Declaration of Charles Edward 24 Lincoln, ¶ 18.	declarant. FRE 602. Hearsay, and multiple level hearsay. FRE 802 et seq. Vague and ambiguous. Inadmissible opinion testimony. FRE 701 et seq. Argumentative.	
25	19. “It may sound harsh, but I 26 am not sure Orly understood 27 even the most basic principles of	Irrelevant. FRE 401, 402. Lacks foundation. Speculation. No showing of	Sustained: _____ Overruled: _____

1	legal research such as evaluating	personal knowledge of	
2	precedent or stare decisis,	declarant. FRE 602.	
3	distinguishing controlling	Hearsay, and multiple level	
4	“holdings” from dicta, or the	hearsay. FRE 802 et seq.	
5	proper application of “most	Vague and ambiguous.	
6	recent controlling precedent	Inadmissible opinion	
7	within jurisdiction” analysis, the	testimony. FRE 701 et seq.	
8	importance of Shepardizing cases	Argumentative.	
9	or doing “case citation” histories.		
10	She certainly had no real idea		
11	how to properly format a case		
12	citation or what lists of cases in a		
13	Shepard’s© Citation page meant		
14	(admittedly, those pages look		
15	pretty mysterious until one learns		
16	how to interpret them, but most		
17	people get past this mystery by		
18	the second month in law school		
19	at the latest).” Declaration of		
20	Charles Edward Lincoln, ¶ 19.		
21			

22 **III. CONCLUSION**

23 For the reasons stated herein, the declarations submitted by Plaintiffs and  
24 their accompanying exhibits cannot be considered in opposition to Moving  
25 Defendant’s subject Motion. If such declarations are considered by this Court,  
26 Moving Defendant respectfully requests that her evidentiary objections to the

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1 declarations be sustained in their entirety, and that such declarations and their  
2 accompanying exhibits not be considered for any purpose.

3

4 DATED: August 8, 2011

**SCHUMANN, RALLO & ROSENBERG, LLP**

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6 By: /s/ Peter Cook  
7 Kim Schumann, Esq.  
Jeffrey P. Cunningham, Esq.  
Peter Cook Esq.  
8 Attorneys for Defendant,  
ORLY TAITZ  
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**SCHUMANN, RALLO & ROSENBERG, LLP**

ATTORNEYS AT LAW  
3100 BRISTOL STREET, SUITE 400  
COSTA MESA, CALIFORNIA 92626-7333  
TELEPHONE (714) 850-0210

**SCHUMANN, RALLO & ROSENBERG, LLP**

ATTORNEYS AT LAW  
3100 BRISTOL STREET, SUITE 400  
COSTA MESA, CALIFORNIA 92626-7333  
TELEPHONE (714) 850-0210

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